

# North Slope Borough

## OFFICE OF THE MAYOR

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*Edward S. Itta, Mayor*

February 24, 2010

### **Via Electronic Mail**

**[skadowski.suzanne@epa.gov](mailto:skadowski.suzanne@epa.gov)**

Suzanne Skadowski  
Community Involvement Coordinator  
Environmental Protection Agency, Region 10  
(206) 553-6689

**Re: Shell Gulf of Mexico/Shell Offshore Inc.'s Application for a Camden Bay Clean Air Act Permit.**

Dear Ms. Skadowski:

The Environmental Protection Agency (EPA) has solicited comments on a proposed Clean Air Act Permit for Shell Gulf of Mexico/Shell Offshore Inc.'s (Shell) Camden Bay Exploration Plan (hereafter referred to as the "Camden Bay permit"). The North Slope Borough (NSB) is committed to the health and welfare of our residents, who are rightfully concerned about potential impacts associated with offshore oil and gas exploration and development. These impacts may be direct, indirect or cumulative in nature and relate to the quality of the natural environment upon which our residents rely.

We note that EPA has only allowed 30 days for public comment (from February 17, 2009 until March 22, 2010) on the proposed Camden Bay permit. This timeframe is inconsistent with 40 day comment period for the recently re-proposed permit for Shell's Chukchi Exploration Plan (the Chukchi Permit), which opened on January 8, 2010 and closed on February 17, 2010. Given the highly technical and distinct nature of both actions, an equal period of comment time to facilitate meaningful review and comment is thus appropriate.

The 30-day limitation is particularly problematic in that the administrative record underlying the permit is not yet available for review. This lack of information makes an already difficult technical review impossible and prevents us from meaningfully responding to the proposed action. The Camden Bay permit is subject to different statutory and regulatory guidelines than the Chukchi permit, as the proposed exploration is within 25 miles of the coast of Alaska. This exacerbates the difficulty in achieving consistent and informed review.

In light of the current unavailability of the administrative record, the different statutory and regulatory guidelines underlying the proposed action and, perhaps most importantly, the much closer proximity of the proposed Camden Bay exploration activity to the coastal district and communities of the North Slope, we request a minimum extension of **15 days** to review the proposed permit. In reviewing this request, we ask that EPA be guided by the principles of Environmental Justice found in Executive Order 12898 and take into account our interest in being meaningfully involved in this decision-making process.

In addition to this request, we ask that EPA make available as soon as possible the administrative record underlying the Camden Bay proposed permit to facilitate review of the action.

Thank you for your consideration of this request. If you have any questions, feel free to contact me.

Sincerely,

 *Acting Mayor*  
2/24/10  
Edward S. Itta  
Mayor

Cc: Dan Forster, Director, NSB Planning  
Taqulik Hepa, Director, NSB Wildlife  
Karla Kolash, Special Assistant, NSB Mayor  
Andy Mack, Special Assistant, NSB Mayor  
Bessie O'Rourke, Borough Attorney  
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