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02/17/2010 10:58 AM

To R10OCSAirPermits@EPA

cc mwhiting@nwabor.org, 'Grant Hildreth'
<ghildreth@nwabor.org>, 'John Chase'
<jchase@nwabor.org>, "'Sen. Donny Olson'"
bcc

Subject Comments Shell Chukchi Air Permit

Kia ora,

Please see attached comments on the Shell Chukchi Air Permit.

Ukallaysaaq Tom Okleasik,
Planning Director
Northwest Arctic Borough
PO Box 1110
Kotzebue AK 99752
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Assembly resol 08-04 OCS dev.pdf EPA_comments_Air_Chukchi_Sea Feb 2010.pdf

NORTHWEST ARCTIC BOROUGH

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February 17, 2010

Shell Chukchi Air Permit

E-mail: R10ocsaairpermits@epa.gov

EPA Region 10

1200 6th Ave, Ste. 900

Mail Stop: AWT-107

Seattle, Washington 98101

Subject: Comments EPA Region 10 Permit # R10OCS/PSD-AK-09-01

Dear EPA Air Permit Preparer/Reviewer:

The Northwest Arctic Borough (Borough) submits these comments for the proposed Shell Gulf of Mexico Inc. (Shell) Clean Air Act permit that was modified in January 2010. The permit would allow Shell to operate the *Frontier Discoverer* and associated support vessels to conduct exploration activities for oil and gas within its current leases on the Chukchi Sea Outer Continental Shelf (OCS). The primary concerns of the Borough include potential impacts due to air pollution in this natural Arctic environment and subsistence resources/uses, climate change effects, and communication of permit performance and monitoring with the Borough as an affected municipal government.

As background, the Northwest Arctic Borough Assembly expressed their opposition to OCS development and leasing through Resolution 08-04 (please see attached). This resolution emphasizes the importance of subsistence foods to the Iñupiat way of life. It also recognized the critical need for baseline data, environmental and wildlife monitoring, and filling large data gaps for the area. The State of Alaska expressed its concerns about the lack of baseline data for the Chukchi Sea in its final Alaska Coastal Management Program Consistency Response for Chukchi Lease Sale 193. In the consistency response, the Division of Coastal and Ocean Management (DCOM) in the Alaska Department of Natural Resources acknowledged the need for more information for future oil and gas exploration and development in this unique and environmentally important area.

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The residents of the Borough proudly depend on marine mammals (such as beluga whales, seals and walrus), fish (such as shee-fish), and other marine life for food and cultural sustenance. Clean air and water is essential for the continued availability of these traditional and subsistence resources to our residents and communities. The Chukchi Sea environment is a pristine Arctic eco-system that one of the world's last natural habitats that is important to our communities, residents and wildlife. Introduction of air pollutants is very concerning to the health and sustainability of this system.

The approval of new industrial activities in the Chukchi Sea that will introduce new air pollutants must include consideration of impacts to the natural environment and subsistence resources, including cumulative effects. The Borough is concerned about the potential impacts of new sources of pollutants, such as those associated with this permit, compounded with existing sources of air pollution, including long-distance transport of pollutants to Arctic areas. Long-distance transport of pollutants is proven; however, still not fully understood. In addition to actual risks, the perception of risks to subsistence resources can result in impacts to our residents, especially if such perception leads to substitution of less nutritious western foods.

The Borough appreciates Shell and the EPA for the proposed amendments to the permit that would address air quality concerns through ultra-low sulfur diesel. This change will result in a significant reduction of sulfur dioxide – although not fully addressing all pollutant concerns. We also appreciate EPA's efforts to reduce emissions of carbon dioxide, nitrogen oxides, volatile organic compounds, and particulate matter.

The Borough is also concerned with global climate change. Current information is especially important in light of changes to species concentrations and distributions as a result of climate change. Polar bear, whales, walrus and seals are particularly sensitive to climate change. The cumulative effects of activities from oil and gas exploration and development associated with climate change and increased natural hazards are an important consideration that that needs to be addressed and understood before further exploration occurs.

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The Borough requests that EPA establish permit conditions with methods to communicate results of compliance with the EPA Air Quality permit and share monitoring information. In addition due to the lack of monitoring equipment and stations, the Borough requests the permit include air quality monitoring stations onshore in the communities of Kivalina, Point Hope and Point Lay. If the project is permitted, the Borough would like to know whether Shell as the applicant is within air quality limits, or exceeding limits and measures to take corrective action. Communication of this information will be useful to Borough staff as well as its residents when reviewing current and future proposals for offshore activities.

This concludes the Borough's comments on the proposed Prevention of Significant Deterioration Permit. In closing, the people of our region have a close and intimate relationship to the Chukchi Sea and its resources. Environmental risks from this project greatly outweigh potential economic benefits, and the considerable lack of baseline scientific information remains an ongoing concern. Please contact me if you have any questions about this letter.

Sincerely,



Ukallaysaq Tom Okleasik, Planning Director

cc: Mayor Siikauraq Martha Whiting
Alagiasq Grant Hildreth, Deputy Planning Director
Kill'aq John Chase, Community Planner & Coastal Area Specialist
Senator Donny Olson, Alaska State Legislature
Representative Reggie Joule, Alaska State Legislature

**NORTHWEST ARCTIC
BOROUGH**

RESOLUTION 08-04_

A RESOLUTION OPPOSING MINERAL MANAGEMENT SERVICES' PLANNED LEASE SALES FOR OIL AND GAS EXPLORATION AND DEVELOPMENT OFF THE COAST OF THE NORTHWEST ARCTIC BOROUGH AND THE NORTH SLOPE BOROUGH AND ESTABLISHING A PROACTIVE POLICY TO REQUIRE THAT DEVELOPMENT IS DONE RESPONSIBLY AND THAT THE DEVELOPERS AND THE UNITED-STATES WORK WITH THE BOROUGHES TO MITIGATE ANY IMPACTS TO SUBSISTENCE RESOURCES AND HABITAT

WHEREAS, the peoples of the North Slope Borough and the North West Arctic Borough use and rely on the subsistence resources that inhabit the arctic waters off their coastlines; and

WHEREAS, these subsistence foods and resources are essential to the Inupiat' way of life and reduce the health impact of western foods and way of life on them; and

WHEREAS, the marine environment in the arctic is delicate and subject to severe disruption and harm from poorly planned and managed oil and gas exploration and development; and

WHEREAS, the developers do not have traditional knowledge to help manage their exploration and development in a responsible manner; and

WHEREAS, for these reasons the North Slope Borough and the Northwest Arctic Borough oppose resource development off their coastlines, but recognize that the federal government will make the final decision on resource development in the OCS; and

WHEREAS, the boroughs are jointly committed to be proactive when it comes to responsible resource development; and

WHEREAS, Inupiat Iitqusiat is the best foundation for successful resource development; and

WHEREAS, the boroughs insist on proper planning, gathering of baseline data, filling of data gaps, monitoring, and implementation of these studies to develop appropriate mitigation of impacts to subsistence resources,

resource exploration and development; and

WHEREAS, the United States and the developers must meet with the communities of the boroughs to inform them of the plans of exploration and development, and to work with them to assess impacts and develop mitigations measures; and

WHEREAS, the United States and the developers must work in good faith with subsistence hunters to mitigate any impacts to subsistence resources and to the hunters' access to those resources that result from exploration and development of oil and gas; and

WHEREAS, the borough's residents must be given the opportunity to train and be employed by the developers and their contractors for jobs related to oil and gas development; and

WHEREAS, the developers must provide capacity building funds to help the boroughs and their communities deal with the impacts of oil and gas exploration and development; and

WHEREAS, the developers should locate support facilities on shore so those facilities will increase the tax base for the boroughs, which will help them to provide training, to build infrastructure, and to reduce the costs of healthcare, schools, transportation, utilities, and housing; and

WHEREAS, the boroughs will lobby the United States to amend its coastal impact legislation so that it provides revenues to them and their coastal communities, which will help the boroughs and their communities build the capacity necessary to address some of the impacts from OCS exploration and development; and

NOW THEREFORE BE IT RESOLVED: that the Northwest Arctic Borough establishes a proactive policy in conjunction with the North Slope Borough to carry out the actions clauses set out above.

PASSED AND ADOPTED THIS 8TH DAY OF FEBRUARY, 2008.



Clement Richards, Assembly President

PASSED AND APPROVED THIS 8TH DAY OF FEBRUARY, 2008.



Siikauraq Martha Whiting, Mayor

SIGNED AND ATTESTED THIS 8TH DAY OF FEBRUARY, 2008.



Helena Hildreth, Borough Clerk

ATTEST:

