

IÑUPIAT COMMUNITY of the ARCTIC SLOPE

an IRA Regional Tribal Government



P.O. Box 934 • Barrow, Alaska 99723
Ph: (907) 852-4227 1-888-788-4227 Fax: (907) 852-2449

The Honorable Deb Haaland
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
Deb_haaland@ios.doi.gov

Dear Secretary Haaland:

Congratulations Madame Secretary for making history as the first Native American to serve as Secretary in the United States government. It is truly an honor and inspiration for all Native Americans to see you rise so high. As the regional Alaska Native tribe North Slope region of Alaska, the Iñupiat Community of the Arctic Slope (“ICAS”) is writing regarding the implications for our communities of recent Executive and Secretarial Orders issued by the Biden administration. ICAS is a regional Alaska Native tribal government governed by the Indian Reorganization Act of 1934 (IRA), and a tribal constitution, as amended, that represents and is selected by the Iñupiat people of the Arctic Slope region. ICAS was established as an IRA tribe on August 26, 1971.

The mission of ICAS is to exercise its sovereign rights and powers for the benefit of tribal members, to conserve and retain tribal lands and resources, to establish and carry-out justice systems including social services pursuant to Iñupiat tribal law and custom, and to increase the variety and quality of services provided to current tribal members and for our future generations. Economic development to generate sustainable funding sources for ICAS as a regional tribal government is pursued to enhance human resource services.

As we are assessing the meaning, magnitude, and possible impacts of the Executive and Secretarial Orders that have been issued since January 21, 2021, we are particularly concerned by Executive Order 14008 titled “Tackling the Climate Crisis at Home and Abroad,” which institutes a “pause” on all new oil and natural gas leases on public lands. We understand the Biden administration’s desire to move quickly to implement new policies, but we call your attention to the fact that we were not consulted about any of these Orders, many of which may have profound impacts on the future of our region.

As recognized in President Biden’s “Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships,” Executive Order 13175 (“Consultation and Coordination With Indian Tribal Governments”) directs the Executive Branch to engage in “regular, meaningful, and robust consultation with Tribal officials in the development of Federal policies that have Tribal implications.” Although the Memorandum neglects to mention it, Federal law also requires that Executive agencies consult with our Alaska Native corporations, which were established by Congress to serve Alaska’s Indigenous community.

As the regional tribal entity ICAS, often takes a divergent view on individual policies or projects, but with respect to the current and somewhat drastic and conflicting messaging coming out of the Biden administration and the Department of the Interior we are united with other entities within our region in supporting safe, culturally, and environmentally responsible development of onshore oil and gas resources on the North Slope. Resource development is critical to the economic survival of the eight Iñupiat villages that call this region home. Moreover, we view these oil and gas resources, which lie under our homeland, as resources that are ours to co-manage. The Federal Government and State of Alaska selected these resource-rich lands, including the National Petroleum Reserve-Alaska (NPR-A), as their own before our people—the Indigenous people of this region—had an opportunity to petition Congress to “settle” aboriginal land claims, five decades ago. The Department of the Interior manages these lands and resources, which are truly our birthright.

Of immediate concern to ICAS, it has come to our attention that a list of dozens of Federal actions that the Biden administration plans to review pursuant to the Executive Order 13990 titled “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis” includes the Willow Master Development Plan Project (“Willow Project”) and the new 2020 NPR-A Integrated Activity Plan and Environmental Impact Study (“NPR-A IAP/EIS”). ICAS participated in tribal, government-to-government consultation on both. Our name is listed on the covers of both Records of Decisions – this is not to be taken lightly.

The environmental review of the Willow Project was recently completed pursuant to the NPR-A Integrated Activity Plan (IAP), a land management plan developed and finalized in 2013 by the Obama-Biden administration and signed by then-Secretary of the Interior Ken Salazar. The Willow Project has strong local support, including ICAS support; we hope and expect that this project will move forward as planned. Likewise, we support the 2020 NPR-A IAP/EIS, because of our engagement and participation. We understand that the request to initiate a new NPR-A IAP/EIS was submitted to the Bureau of Land Management by the North Slope Borough. ICAS was consulted with by the North Slope Borough in early-2018 ahead of making its request to the Bureau of Land Management. ICAS agreed with the reasons and purposes for initiating the new NPR-A IAP/EIS, now the 2020 NPR-A IAP/EIS.

The North Slope Borough receives 96% of its revenues from taxes levied on oil and gas infrastructure. These funds provide direct benefit to North Slope residents by allowing the Borough to provide valuable services, including educational services (including support for Alaska’s only tribal college); fire, police, and search and rescue services; water and sewer infrastructure; local employment; and heating and electric subsidies. The immediate impacts of global climate change on the North Slope also require concrete public services such as building and rebuilding protective coastal berms, storm fighting, rebuilding roads, and other infrastructure costs associated with melting permafrost.

The Willow Project will augment the taxes the North Slope Borough receives through sharing of federal royalties under the NPR-A Impact Mitigation Grant program. This program requires that 50% of federal revenue in NPR-A be made available to communities most impacted by oil and gas development. The BLM estimates that over \$2.6 billion could be generated for the communities of the North Slope Borough if the project is allowed to proceed as planned and as approved.

Alaska’s oil and gas industry provides much-needed jobs for our people, tax revenue to support our schools and health clinics, and support for basic public services like water treatment in our communities. No person from the Lower 48 states who lives on the road system or is connected to the electric grid can truly appreciate the difficulty of surviving as isolated communities in America’s Arctic. We ask the Biden administration to work with our Federally recognized tribes, our mayors,

and our Indigenous-owned businesses to find common ground on oil and gas policy for Alaska. Both the 2020 NPR-A IAP/EIS and Willow Project have the support of the Iñupiat Community of the Arctic Slope. They represent a durable addition to the North Slope economy and long-term sustainability for our region. Additional revenue to our region will also assist us in planning our future and adapting to the changes in the climate that we are experiencing in the Arctic. They provide for culturally and environmentally, responsible development, increased employment opportunities to residents of our region, and an important source of new revenue while addressing the needs of regional subsistence users and ensuring strong mitigation measures to protect the environment. We know this to be true because we have participated with the federal agency through the process and analysis. If the agency had veered away from our input, we would have not allowed the two Records of Decisions to be issued with our name on the cover.

Again, congratulations on your confirmation Madam Secretary. If you have questions for our leadership, please reach out. We look forward to working with you.

Sincerely,

 Date: 4-21-21

George Edwardson
President
Iñupiat Community of the Arctic Slope

Cc: Congressman Don Young
Senator Dan Sullivan
Senator Lisa Murkowski
Laura Daniel-Davis, Principal Deputy Assistant Secretary – Land and Mineral
Management
Nada Culver – Deputy Director of Policy and Programs, Exercising delegated
authority of the BLM director
Chad Padgett, Alaska State Director – Bureau of Land Management