



February 15, 2024

Representative Tom McKay  
Chairman, House Resources Committee  
33<sup>rd</sup> Alaska State Legislature

Re: Support for House Joint Resolution 20

Submitted via email to: [ed.king@akleg.gov](mailto:ed.king@akleg.gov) and [elizabeth.rexford@akleg.gov](mailto:elizabeth.rexford@akleg.gov)

Dear Mr. Chairman and Members of the House Resources Committee,

This is a letter in support of House Joint Resolution No. 20, a resolution urging withdrawal of proposed Bureau of Land Management regulations affecting the National Petroleum Reserve in Alaska; and urging meaningful engagement with tribes, local governments, and affected communities.

Iñupiat Community of the Arctic Slope (ICAS) is a regional federally recognized tribe under the Indian Reorganization Act of 1934 and its tribal constitution. ICAS was established on August 26, 1971. Membership of ICAS includes the Native Villages of Atkasuk, Utqiagvik, Point Lay, Kaktovik, Point Lay, Nuiqsut, and Point Hope, and Village of Wainwright and Nagsragmiut and all their tribal citizens. Our mission is to exercise our sovereign rights and powers for the benefit of tribal citizens, to conserve and retain tribal lands and resources including subsistence and the environment, to establish and carry-out justice systems pursuant to Iñupiat tribal law and custom, and to increase the quality of services provided to current tribal members and for future generations.

All eight of our communities and nine federally recognized tribes are impacted directly by decisions about the federal lands in the North Slope, including within NPR-A which is fully encompassed by the North Slope Borough. The tribes have the legal entitlement to proper consultation. Proper notice of consultation did not occur with ICAS when the Proposed Rule for the Management and Protection of the National Petroleum Reserve in Alaska was announced on September 6, 2023. The tribes were left out of the decision-making process which we have a right to be included in; therefore, the Federal government violated their legal obligation to honor government-to-government relationships with federally recognized tribes. This has a direct impact on our lands and our people.

On September 8, 2023, the Proposed Rule was published in the Federal Register with only a 60-day comment period and ruling of “not economically significant.” Changing the way in which land is managed will not only affect the tax base of the region, but also access to privately held lands in the region, all of which will have a significant impact on the economics of the people that live on the North Slope. ICAS does not agree with the ruling of economically insignificant, which is one of the many reasons why we write today to support HJR 20.

The Proposed Rule is broad, vague, and will make sweeping yet hard to define changes to solely the North Slope region. To better understand the intended and unintended consequences of such a sweeping proposed rule, many North Slope organizations and others wrote BLM asking for an extension of 90-days to the initial 60-day timeframe. A total of 30-days was added to the public comment period. Please keep in mind that the announcement of the proposed rule was made the same very day that Kaktovik landed its first whale of the fall whaling season. Additionally, half of the North Slope communities were in the middle of a broadband outage due to a fiber optic cable scour on June 11, 2023; yes, three months later the cable was still not repaired.

Since September 8, there have only been a total of four engagements (informational and public meetings, and formal consultations) conducted with our tribes (one with ICAS), not nearly sufficient to support a rule that BLM claims they want to be enduring. During this failed public process, BLM has essentially left out those that will be most affected by the proposed rule. In addition to the lack of engagement, the confusion around the timing of engagements has added to the failure of BLM to meaningfully engage. Public and informational meetings were noticed with little lead time, canceled and/or postponed suddenly, and in some cases never rescheduled.

It is for the reasons above that ICAS supports House Joint Resolution 20.

Quyanakpak,

A handwritten signature in black ink that reads "George Edwardson". The signature is written in a cursive, flowing style.

George Edwardson, President