

**Agency Responses to Comments Received during the  
2011 Alaska Forum on the Environment  
EJ IWG Community Dialogue  
Anchorage, AK  
February 7-11, 2011**

The Interagency Working Group on Environmental Justice (IWG) conducted 18 community dialogues across the country from February 2011 to November 2011. Comments and concerns of the community were recorded at each meeting. The IWG's commitment was that its agency partners would provide responses to communities about the concerns that were raised during these meetings.

This matrix reflects many of the comments that we heard during the first session held at the 2011 Alaska Forum on the environment. The right hand column of the matrix includes responses provided by federal agencies to specific issues of concern.

None of the responses from other agencies have been edited by the EPA. Any additional questions or concerns that you may have should be directed to the agency contact as indicated.

Environmental Protection Agency: [white.sherri@epa.gov](mailto:white.sherri@epa.gov)

Department of Health and Human Services: [sandra.howard@hhs.gov](mailto:sandra.howard@hhs.gov)

Department of Interior: [loretta\\_sutton@ios.doi.gov](mailto:loretta_sutton@ios.doi.gov)

| Stakeholder recommendations/Comments  | Agency Response   |
|---|---|
| <b>General</b>  |   |
| <p><b>1. New environmental studies/testing are needed, and these studies should incorporate traditional knowledge, be culturally relevant, focus on vulnerable populations and age groups, and specifically explore health effects as they relate to contaminants, subsistence foods, and climate change.</b></p> | <p><b>Department of the Interior (DOI) Response:</b> The Bureau of Ocean Energy Management, Reclamation and Enforcement (BOEM) Alaska Region Environmental Studies Program (ESP) has funded and intends to continue to fund studies on traditional and local knowledge that focus on vulnerable populations and age groups, and that explore health effects as they relate to contaminants, subsistence foods, and climate change. The BOEM Alaska Region ESP has funded and intends to continue to fund baseline and monitoring studies in compliance with the Outer Continental Shelf Lands Act and in support of National Environmental Policy Act (NEPA) analyses.</p> <p>Fish and Wildlife Service (FWS) has worked with State Department of Public Health (DPH) on studies/outreach related to contaminants in subsistence foods.</p> <p>National Park Service (NPS) has supported interagency, cooperator, and community participation in ongoing Climate Change Scenario Planning workshops throughout the State. Through participation on interagency peer review and advisory panels, NPS has successfully recommended support for development and field testing of new measures of food and environmental safety (e.g., Alaska Sea Grant shellfish toxin testing).</p> <p><b>Environmental Protection Agency (EPA) Response:</b> At Superfund sites EPA specifically examines Native Alaskan health risks due to site related contamination. EPA works with affected tribes to collect the information needed to assess those risks. EPA has supported efforts to characterize levels of contamination in the Alaska environment. (<i>Agency for Toxic Substances and Disease Registry (ATSDR) and Department of Health and Human Services (HHS) may look at exposure to and impacts of exposure to environmental contamination from all sources, including balancing contaminant risks and benefits from using natural resources</i>).</p> <p>In remediating Superfund sites, EPA considers cumulative risks posed by all site related exposure pathways and contaminants. EPA considers unique lifeways of the exposed</p> |

|   |   |
|---|---|
|   | <p>population in this process. <i>(HHS and ATSDR may consider cumulative exposure from all sources of contamination)</i></p> <p>EPA’s Superfund program involves affected communities in the process of remediating sites. During selection of the final cleanup option, the Agency evaluates community acceptance of the proposed remedy. EPA’s Superfund program evaluates subsistence food use in remediating sites to insure that the cleanup selected will protect subsistence resource use to the maximum extent possible. In addition, the Superfund program incorporates traditional knowledge in determining how Native Alaskans may be exposed to site related contamination. EPA supports the State of Alaska in monitoring levels of contamination in fish and making those results available to the public.</p> <p><i>Project-specific detail:</i> For the Beaufort and Chukchi Exploration National Pollutant Discharge Elimination System (NPDES) General Permits, EPA is relying on existing information to analyze the potential effects of the discharges to the marine environment. In addition, EPA will require operators to collect environmental data prior to, during, and after drilling to ensure unreasonable impacts do not occur. Through traditional knowledge workshops, community members had the opportunity to provide observations about near shore physical and biological habitats, marine resources, subsistence use areas, and concerns about the potential effects of oil and natural gas related discharges to subsistence areas. EPA is using these observations, in part, to develop conditions for the permits.</p> |
| <p><b>2. For new developments and resource extraction, environmental and public health baseline studies are needed, as well as ongoing human and environmental health surveillance.</b></p> | <p><b>DOI Response:</b> Fish And Wildlife Service reviews environmental studies produced by project proponents under National Environmental Policy Act (NEPA), the Fish &amp; Wildlife Coordination Act, Endangered Species Program (ESA), Marine Mammal Protection Act (MMPA) and others.</p> <p><b>EPA Response:</b> See EPA response under #1.</p>   |
| <p><b>3. When creating policies, programs, or research studies, consider social, economic, human health, and cultural factors and, in particular, cumulative impacts.</b></p>               | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for Bureau of Land Management (BLM). We routinely consider social, economic, human-health, and cultural factors when we develop policies, programs, research studies and land use decisions.</p> <p>U. S. Geological Survey (USGS) is a member of the Alaska Interagency Ecosystem Health</p>   |

Working Group, studying the relationship between ecosystems and human health. (eg. USGS partnership with the Alaska Native Tribal Health Consortium examining cyanotoxins in drinking water sources).

Bureau of Ocean Energy Management, Environmental Studies Program (BOEM ESP) biological studies of marine mammals routinely include traditional knowledge and local knowledge. Sociocultural studies focus on social, human health, and cultural factors to assess direct, indirect, and cumulative impacts of oil and gas exploration, primarily offshore.

Fish and Wildlife Service routinely considers social and economic factors. Cumulative impacts are an emphasis item in our National Environmental Policy Act (NEPA) compliance and conduct human health assessments, if appropriate.

In five national parks in Alaska, current studies on subsistence have a strong focus on traditional knowledge. Some projects are focusing entirely on traditional knowledge.

In three national parks in Alaska, contaminants and subsistence foods have also become a focus for ecological studies and monitoring of fish with links to possible health effects on subsistence activities.

**EPA Response:** EPA Region 10 recognizes that there is a need for baseline monitoring in Alaska. EPA provides the State of Alaska with Section 106 Clean Water Act funds to build State capacity and implement the State monitoring strategy. The State also receives funding to participate in the National Aquatic Resource Survey, to conduct monitoring in the Arctic Coastal Plain. EPA provides General Assistance Program (GAP) funding to the Tribes, which can be used to collect baseline monitoring data.

On the issue of Tier 3 classification, EPA Region 10 is actively working with the State of Alaska to develop and review their anti-degradation policy to protect high quality waters. EPA will then work with the State to ensure their anti-degradation implementation procedures are in place.

|  |   |
|--|---|
|  | <p>The Region 10 Water Quality Standards Program works with the State when there are changes to State water quality standards to ensure that the standards are consistent with the Clean Water Act regulations. EPA also has a responsibility to ensure that the State is appropriately implementing its water quality standards.</p> <p>There is Water Quality Standards training available to Tribes. EPA Region 10 periodically presents a Mining 101 training which includes information on Water Quality Standards relevant to resource extraction. Tribes may also participate in the Water Quality Standards Academy. The classroom version of this course is offered throughout the country several times each year, and an online version is also available at:<br/> <a href="http://water.epa.gov/learn/training/standardsacademy/">http://water.epa.gov/learn/training/standardsacademy/</a>.</p> <p>Baseline Monitoring is an allowable activity under IGAP for 3-5 years.</p>  |
| <p><b>4. Communities need to see action as a result of their participation; meaningful involvement should be followed by tangible Government accountability.</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. For example, BLM is working closely with communities in the vicinity of the Red Devil Mine. We met with communities and used their input to develop the Red Devil Mine Remedial Investigation Work Plan.</p> <p>Government-to-Government consultations in the new DOI Consultation Policy will improve this process.</p> <p>The Bureau of Indian Affairs (BIA) routinely solicits input from Tribes regarding any project that may have potential to cause effects as required by NEPA.</p> <p>BOEM ESP is requiring contractors/consultants to continue with community involvement and engagement repeatedly throughout the life of a study (i.e., not only at the beginning of a study). At the request of prominent North Slope Inupiat leaders, BOEM ESP already requires sociocultural studies consultants to write a plain language executive summary for stakeholders, which is posted on the BOEM website. BOEM ESP staff and NEPA analysts work together to ensure that data (empirical observations, traditional knowledge, and learned knowledge) from stakeholders is incorporated in NEPA documents.</p> <p>Government-to-Government consultations; comments addressed in planning &amp; NEPA</p> |

documents; community meetings; Fish and Wildlife Service opened an office in Barrow in response to requests from the community for greater coordination.

In two national parks in Alaska, ongoing and proposed community-based socio-economic studies document contemporary subsistence activities for rural communities in and near parks. These studies help provide a comprehensive understanding of subsistence economies and the important roles they play in the social, cultural, human health and community sustainability. These studies are used by the Federal Subsistence Board, the State Boards of Fish and Game, and other regulatory decision-making bodies that are charged with protecting subsistence opportunities.

**EPA Response:** EPA Region 10 is committed to meaningful involvement, transparent decision-making and actions informed by public input. We recognize that public involvement, public comment and traditional knowledge need to be valued and reflected in our actions; that whenever possible pertinent information should be easily available to the public; that we have a responsibility to facilitate community participation in decision-making by building community capacity; and that communities often have a stake in decisions and should be involved in those decisions early in the process. EPA Region 10 is also committed to its Tribal consultation responsibilities.

EPA Region 10 carefully considers comments received during public comment processes, including comments from members and organizations of local communities and native villages. For major permit and project decisions, EPA prepares a detailed response to public comments, posted on our website and provided to communities. EPA Region 10 often takes many extra steps to facilitate a more meaningful opportunity for public participation in permitting decisions prior to and during public comment periods, including early informational meetings, quarterly updates/newsletters, and teleconferences with villages and tribes.

EPA Region 10 provides public comment and tribal consultation opportunities for potentially affected and interested communities and tribal governments to participate in permit decisions and other actions in Alaska. Our *North Slope Communications Protocol* lays out a number of actions such as planning longer public comment opportunities combined with extra efforts to

inform communities early, and multiple opportunities for participation.

EPA entered into a cooperative agreement with the Alaska Department of Environmental Conservation (ADEC) for a project to enhance tribal access to information and participation in Clean Water Act permitting. The first year of the project resulted in the development of a tribal notification protocol and a website for permit information.

<http://www.dec.state.ak.us/water/TribalCommunication/tribes.html>

The current and final year of the project involves cultural competency training of ADEC and other agency staff and internal and external outreach efforts.

EPA Region 10 takes action to ensure Alaska communities have easy access to relevant information on our comprehensive oil and gas sector website. Key documents are emailed or mailed to communities on request. For certain high profile projects, such as permitting activities in the Arctic, EPA sends regular newsletter updates to communities and other stakeholders.

EPA Region 10 is currently exploring existing resources and strategies to identify measures that could be taken to improve technical assistance to Alaska Tribes. Tribes can access technical assistance through direct contact with EPA staff (e.g. assistance from tribal coordinators and media programs). The Indian General Assistance Program (IGAP) is a capacity building program for tribal environmental programs. Tribes with IGAP programs may also include training components in their work plans. Monthly EJ webinars are being held on topics requested by stakeholders. Alaska communities and stakeholders are encouraged to submit topics. EPA also funds partners to provide technical assistance to communities on monitoring, such as Alaska Native Tribal Health Consortium (ANTHC) and the Institute of Tribal Environmental Professionals (ITEP). EPA staff and partners may be able to help with data and document interpretation. Resource extraction and tribal involvement training, among other topics, will be provided at the Alaska Forum on the Environment (AFE) in February 2012.

EPA Region 10 strives to plan public and tribal meetings to meet the needs and interests of the community, and to help make that complex project information accessible and available in varied formats, including small group discussions, presentations and visual displays.

|  |  |
|--|--|
| <p><b>5. Capacity building resources are needed. For example, data needs to be made accessible at local level, resources should be allocated to Tribes to do their own monitoring, and technical assistance should be provided to communities to understand and use data, tools, and policies.</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. For example, BLM coordinates with the Agency for Toxic Substances and Disease Registry (ATSDR) and the Alaska Department of Health and Social Services (DHSS). BLM also met with communities in the vicinity of the Red Devil Mine to discuss concerns and preliminary results from fish tissue studies. BLM also worked with Fish and Wildlife Service and DHSS in the development of fish consumption advisory.</p> <p>USGS provides training for Tribes through the Students in Support of Native American Relations (SISNAR) and Technical Training in Support of Native American Relations (TESNAR) programs (eg. Partnership with Yukon River Inter-Tribal Watershed Council on the Yukon River to study water quality and its relation to climate).</p> <p>In addition to measures taken as noted above for stakeholder engagement, BOEM ESP has insisted that consultants develop capacity building at the local level to assist with contracted sociocultural studies. For example, BOEM’s monitoring study of Cross Island Bowhead Whale Subsistence Hunting includes a requirement for the contractor to write a training manual for cross training and capacity building purposes.</p> <p>Fish and Wildlife Service provides training to help communities address issues such as bear/human interactions and to conduct polar bear patrols. Fish and Wildlife Service works with the Alaska Nanuq Commission to help manage polar bear harvest. We also train regional subsistence representatives in the national migratory bird hunting regulations.</p> <p>NPS publishes the Alaska Park Science journal to summarize research information for general audiences, including Tribes, and makes it available to schools, libraries and the internet. Data, summaries, and reports from NPS Natural Resources Inventory and Monitoring are available on NPS websites.</p> <p><b>EPA Response:</b> See EPA response to #4.</p> |
| <p><b>6. Ensure that all communities have clean air, water, food, and adequate sanitation</b></p>  | <p><b>EPA Response:</b> See EPA response to #3.</p>  |



|  |   |
|--|---|
| systems.   |   |
| <p><b>7. Protect subsistence food systems by including indigenous communities in decision-making and considering the potential disproportionate impacts of policies, programs, and developments on Alaska Native Villages.</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. BLM engages in Government-to-Government consultation, invitations for cooperating agency status for NEPA documents, and analyzes subsistence impacts through Alaska National Interest Lands Conservation Act (ANILCA) 810 analyses. BLM conducts studies and monitoring related to subsistence foods (e.g., caribou and moose monitoring, fish tissue analysis).</p> <p>The Bureau of Indian Affairs (BIA) analyzes and/or requests input on any undertaking that could potentially affect subsistence resources. The BIA provides technical assistance and some grant funding for tribes involvement in the Federal Subsistence Board program work, including Regional Advisory Councils and the Board’s public meetings.</p> <p>BOEM's ESP has developed state-of-the-art techniques for mapping subsistence hunts using GPS units and incorporating ethnographic surveys of hunters to obtain additional data. These maps show the intensity of use and monitor changes due to environmental or other conditions.</p> <p>FWS examples: Federal subsistence program; Government-to-Government consultation, environmental justice consideration in NEPA and planning documents, ANILCA Section 810 analysis. The FWS conducts studies that provide information that protects indigenous foods (e.g., mercury in pike). In development project reviews, the FWS provides recommendations to avoid/minimize contamination of land and water resources. We craft /implement Marine Mammal Protection Act Incidental Take regulations that ensure there are no impacts to subsistence uses.</p> <p>Communities are included in the decision-making process for the management of subsistence harvest on public lands by participating in NPS Subsistence Resource Commissions (seven parks), Subsistence Regional Councils (ten regions), and a new process that will begin in August, 2011, through Government-to-Government consultation with 229 federally recognized Tribal Governments in Alaska. Additionally, NPS considers the potential for disproportionately high or adverse human health or environmental effects on minority and low-income populations</p> |

in all park planning and decision-making.

**EPA Response:** EPA Region 10 is implementing these recommendations by working with tribal villages to incorporate traditional knowledge information in our decisions and reviews, including: the Chukchi and Beaufort National Pollutant Discharge Elimination System (NPDES) general permits, Cook Inlet NPDES general permit, Red Dog Mine Supplemental Environmental Impact Statement (SEIS), and the Bristol Bay watershed assessment.

We also implement these recommendations through our invitations to affected tribal governments to participate in government-to-government consultation on our permits, resource extraction and other actions in Alaska. EPA Region 10 evaluates communities' concerns in our decisions and reviews, and considers potential disproportionate impacts.

Where appropriate and if resources allow, EPA collects Traditional Ecological Knowledge (TEK) from tribal members and subsistence users. TEK has been used in several EPA deliberations and decision making processes in Alaska, e.g., Cook Inlet NPDES General Permit and the Red Dog Supplemental Environmental Impact Statement.

EPA Region 10 works closely with native villages to incorporate TEK in our decisions and reviews. EPA looks for opportunities to leverage resources with our local, state and federal partners.

Subsistence issues were a main topic of the 2009 EJ Conference in Barrow sponsored by Inupiat Community of Arctic Slope (ICAS) and funded by EPA through an Environmental Justice Small Grant. One of the main topics was documenting subsistence use areas and TEK.

EPA Region 10 is currently (2012) funding a statewide EJ Small Grant in Alaska, focusing on solid waste issues. Sites, including open dumps, can have acute impacts to subsistence use areas near villages. Work done with this funding will lay some critical groundwork for understanding the issues and responding to concerns.

Communications during the ongoing events associated with Arctic Seal Sickness are a positive

|   |  |
|---|--|
|   | <p>example of how EPA works closely with tribes. EPA sent notices to Indian General Assistance Program (IGAP) Environmental Directors in Alaska updating tribes on this issue. Many local village observations have come back to EPA and the Alaska Native Tribal Health Consortium (ANTHC). ANTHC has been adding this information to an interactive Google map, and is tracking the spread of the problem in seals across the Arctic. This is made possible with IGAP funding.</p> <p>EPA funded a contractor to document TEK for some participating villages on the North Slope for additional background information for the general NPDES permit for exploratory drilling during 2010-11 (and for use on other future permitting actions). TEK was included in the FY2013 R10 GAP Funding Announcement for the first time.</p>  |
| <p><b>8. Government agencies need to better streamline their processes and coordinate services internally and externally.</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We continually strive to streamline processes and coordinate services.</p> <p>The BIA works with Federal and State partners to ensure similar program work and services are coordinated (e.g., Federal Highway Administration and Indian Reservation Roads transportation, subsistence and environmental health topics).</p> <p>Government-to-Government consultation; community meetings, refuge information technicians; limited ability to streamline many processes due to legal constraints. FISH AND WILDLIFE SERVICE opened an office in Barrow to help streamline communication by providing a single point of contact for issues.</p> <p>The Federal Subsistence Board develops subsistence hunting and fishing regulations for all DOI and USFS agencies on Federal lands in Alaska rather than each agency developing their own. More can be done to assist subsistence user's work through all of the complex regulatory processes especially when it comes to the interaction of State and Federal wildlife and fisheries regulations.</p> <p><b>EPA Response:</b> EPA's policy is to invite consultation with federally recognized tribal governments when EPA actions and decisions may affect tribal interests.</p> |

|  |   |
|--|---|
|  | <p>The term "tribal interests" is broadly interpreted when implementing the Policy. EPA will consult with tribes when undertaking actions that may affect recognized rights and interests. These could be interests protected by treaty, statute, judicial decisions, or other legal authorities. These could also include EPA activities that may affect hunting, fishing, and gathering rights or access granted to tribes under treaties between the United States and a tribal government.</p> <p>EPA developed the Tribal Consultation Opportunities Tracking System (TCOTS) database which is accessible on the internet and includes upcoming and current EPA consultation opportunities for tribal governments. TCOTS allows users to view and sort information, and to submit comments on a tribal consultation. EPA's TCOTS webpage is located at <a href="http://yosemite.epa.gov/oita/TConsultation.nsf/TC?OpenView">http://yosemite.epa.gov/oita/TConsultation.nsf/TC?OpenView</a></p> <p>EPA provides a response to the tribe(s) involved in a consultation to explain how their input was a considered in the final action. This response usually takes the form of a formal, written communication from a senior EPA official to the tribe.</p> <p><b><i>NOTE: EPA Region 10 Tribal Consultation Procedures (Consultation Draft was sent out to Tribal Governments on December 6, 2011)</i></b></p> <ul style="list-style-type: none"> <li>• Region 10 staff has developed Region-specific procedures to implement EPA's National Tribal Consultation Policy, and to respect and accommodate the unique consultation needs and practices of the 271 federally recognized tribes in EPA Region 10.</li> <li>• The procedures answer the questions of Why We Consult, What is Consultation, Who in Region 10 is Responsible for Conducting and Supporting Tribal Consultation, and How We Consult.</li> </ul> |
| <p><b>9. Conduct a DOE Community Leaders Institute in Alaska</b></p>   | <p><b>Department of Energy Response:</b> DOE will conduct a Community Leaders Institute during the 2012 AFE.</p>  |
| <p><b>Children's Health</b></p>  |   |
| <p><b>10. We need to consider a child's vulnerability at various life stages (i.e. infant, toddler, youth,</b></p> | <p><b>EPA Response:</b> EPA has policies and guidance documents to help ensure that children's health and age-related changes in behavior and physiology are addressed. See EPA's Children's Health website (<a href="http://epa.gov/children">epa.gov/children</a>) and EPA's Risk Assessment Portal (<a href="http://epa.gov/risk">epa.gov/risk</a>). EPA's <a href="#">Guidance</a></p>  |

|  |   |
|--|---|
| <p>teen)</p>   | <p><a href="#">on Selecting Age Groups for Monitoring and Assessing Childhood Exposures to Environmental Contaminants (PDF)</a> provides to EPA scientists with a consistent set of childhood age groups to improve risk assessments for children and assist the Agency in implementing regulatory initiatives.</p> <p>Since January 2011, EPA Region 10 has been convening the Rural Alaska Children's Environmental Health Working Group, to bring together agencies, organizations, community members, and other interested stakeholders to build capacity around children's environmental health issues in rural Alaska and identify steps to protect children from environmental exposures. This group has two workgroups, one focused on Healthy Homes, the other on ensuring Healthy Schools.</p> <p>EPA's Superfund program considers the unique vulnerabilities of children in assessing health risks.</p> |
| <p><b>11. Generation and location specific studies are needed (e.g. allergies, cancer)</b></p> |   |
| <p><b>12. We need testing on Native/traditional foods for contaminants</b></p>                 | <p><b>DOI Response:</b> NPS has supported testing for environmental contaminants and subsistence species, in multiple Alaska parks, when warranted by other information (e.g., Western Airborne Contaminants Assessment research into airborne pesticide and herbicide contaminants, Red Dog Mine testing of heavy metal contaminants, mercury testing in fish species).</p>  |
| <p><b>13. We need <i>new</i> testing</b></p>   | <p><b>DOI Response:</b> Through participation on various interagency panels, NPS has encouraged development and field testing of new measures of food and environmental safety (e.g., Alaska Sea Grant development and testing of shellfish toxin tests, and of ways to avoid shellfish toxicity).</p>  |
| <p><b>14. Traditional knowledge should be incorporated into studies</b></p>                    | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We work with communities and Tribes to incorporate traditional knowledge into decisions and studies. We gain traditional knowledge through Government-to-Government consultations, cooperating agency invitations, community meetings and public comment requests.</p> <p>Although BIA does not conduct studies, BIA does advocate for incorporating traditional knowledge in the Alaska Climate Change Executive Roundtable, Landscape Conservation</p>   |

|  |  |
|--|--|
|  | <p>Cooperatives, Federal Subsistence Board’s Regional Advisory Councils, the statewide interagency workgroup on Climate Change and Human Health.</p> <p>USGS seeks opportunities to incorporate/consider traditional ecological knowledge (TEK) into our research studies (eg. TEK used to identify problems associated with telemetry collar designs for tracking polar bears); the USGS Arctic Outer Continental Shelf (OCS) Science Gap Report identified TEK as a critical resource.</p> <p>The BOEM ESP has funded a number of successful projects designed to collect and record traditional knowledge, including case studies and biographies of key informants in the village of Point Lay that have since been incorporated into the public school curriculum; a long-term cooperative agreement with Alaska Department of Fish and Game to produce “biographical jukeboxes” to share information from small villages; a fisheries project pairing ten local experts from Nuiqsut with Western scientists to demonstrate contributions that local experts could make to exchange information and improve understanding of arctic cisco availability in local streams; and multiple ongoing projects to utilize the skills of local hunters as research partners and participants in attaching satellite tags to various species of wildlife (whales, seals, walrus) to support remote data collection.</p> <p>Traditional knowledge is applied in the Federal subsistence management program, refuge planning, and on-going consultation/communication (e.g., Western Arctic Caribou Herd Working Group). FISH AND WILDLIFE SERVICE also incorporates traditional knowledge into marine mammal studies (e.g., polar bear feeding ecology studies in Kaktovik).</p> <p>NPS seeks appropriate opportunities to incorporate and preserve traditional knowledge, for example through support for community participation in Shared Beringian Heritage projects; cultural, natural, and subsistence resource and harvest studies in multiple parks.</p> <p><b>EPA Response:</b> See EPA response #4.</p> |
| <p><b>15. Consider social and economic impacts on individual families (consider abuse, neglect, suicide, etc.)</b></p> | <p><b>DOI Response:</b> The BIA considers social and economic impacts for all BIA funded undertakings. Additionally, BIA provides services and funds tribal-provided services for human and social needs via Branch Human Services (aka Social Services).</p>  |

|  |   |
|--|---|
|  | <p>The appropriate unit of analysis for socioeconomic impacts conducted under NEPA is the community at large. We do not focus NEPA analysis on individual or household level details, except to the extent that they inform us about larger demographic trends within the community.</p> <p>FWS considers social and economic impacts, as appropriate, at the community level as part of planning &amp; NEPA compliance and review of projects by others.</p> |
| <b>16. Bring the National Institute of Environmental Studies to the table</b>  |   |
| <b>17. Provide resources to determine/study the illnesses, disease, and cancer in our communities</b>  |   |
| <b>18. Ensure that all communities have clean air, water, food, running water, flush toilets, etc.</b>   | <p><b>DOI Response:</b> The BIA Alaska Region provides funding to Tribes when it is available from the Central Office for environmental projects.</p> <p><b>EPA Response:</b> See EPA response #3.</p>  |
| <b>Resource Extraction</b>   |   |
| <b>19. EPA – classification of water quality – need baseline</b><br><b>There is a lack of baseline information</b> <ul style="list-style-type: none"> <li>• Need funds for baseline studies</li> <li>• Water</li> <li>• Tier 3 classification</li> </ul> | <b>EPA Response:</b> See EPA response #3.   |
| <b>20. Clear water and clean water; consider that water also provides a spawning habitat</b>   | <b>EPA Response:</b> See EPA response #3.   |
| <b>21. Resource extraction</b>   | <b>DOI Response:</b> The BIA considers this when reviewing NEPA documents for proposed  |

|   |  |
|---|--|
| <p><b>threatens traditions</b></p>  | <p>actions affecting restricted Native allotments and when Tribes request technical assistance in reviewing NEPA for other agencies proposed actions.</p>  |
| <p><b>22. Offshore oil and gas development – need to consider catastrophic effects and effects on subsistence, culture, way of life (fish, birds [nesting], whales, etc.)</b></p> | <p><b>DOI Response:</b> A hypothetical Very Large Oil Spill (VLOS) scenario is included in the Revised Supplemental Environmental Impact Statement (EIS) for Chukchi Sea Sale 193. Potential effects of VLOS are considered in NEPA documents (EIS, Environmental Assessment (EA)) for oil and gas exploration and development. A VLOS scenario is hypothetical, and is not an analysis of a well that any operator has actually proposed to drill.</p> <p>Through participation in the North Slope Science Initiative (NSSI) and other interagency efforts, the NPS supports science to understand and mitigate environmental and social effects of oil, gas, and mineral development. The NSSI and Canada also hold biennial oil and gas workshops to present information on related topics.</p>   |
| <p><b>23. Consider the cumulative effects of mining/oil and gas development</b></p>   | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. For example, we will be thoroughly considering cumulative effects of oil and gas development and related facilities (e.g., roads, pipelines, infrastructure) in preparation of our Integrated Activity Plan for the National Petroleum Reserve – Alaska. Through NEPA processes, we also consider cumulative effects of mining proposals.</p> <p>Cumulative effects are considered in BOEM NEPA documents. A current ESP study is assessing the vulnerability and resilience of two coastal communities, one on the Beaufort Sea and the other on the Chukchi Sea. The study will quantify data and be robust enough for cross validation. Another ESP study is examining the aggregate effects on Nuiqsut subsistence of terrestrial and offshore oil and gas exploration and development, and is a pioneering study to assess what happens after a Record of Decision (ROD) is issued, including how faithful transnational corporations are implementing required mitigation and monitoring, and how mitigation and monitoring efforts are tracked.</p> <p>Cumulative effects are taken into consideration when Fish and Wildlife Service reviews environmental studies produced by project proponents under NEPA, the Fish &amp; Wildlife Coordination Act, Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA) and others.</p> |



|   |  |
|---|--|
|   | <p>Through participation in the North Slope Science Initiative and other interagency efforts, the NPS supports science to understand and mitigate environmental and social effects of oil, gas, and mineral development.</p> <p>For more than a decade, NPS has cooperated with other Federal and State agencies, Native organizations, federally recognized Tribes, and commercial interests to research and mitigate heavy fugitive dust and heavy metal hazards around the Red Devil Mine.</p> <p><b>EPA Response:</b> EPA and all other federal agencies are required to fully consider and disclose the cumulative effects of our actions where the requirements of NEPA apply to specific Agency actions.</p> <p>Efforts are underway at both Region 10 and the Office of Environmental Justice at EPA HQ, to develop tools and methods of analysis that aim to provide a more comprehensive view of communities in assessing impacts to their health, socioeconomic, environmental and cultural values.</p> |
| <p><b>24. If development occurs, Tribes need to be in a position to conduct monitoring (e.g. air/water)</b></p> | <p><b>DOI Response:</b> BLM supports Tribes in conducting monitoring. We have hired youth who are Alaska Natives to assist with wildlife studies, and used local hire authorities with fisheries studies.</p> <p>This requires continued funding of the EPA Indian Environmental General Assistance (IGAP) program, and grant money to pay for tribes to do monitoring.</p> <p>BOEM will consider this recommendation through the NEPA and permitting process when an Outer Continental Shelf (OCS) development and production plan is submitted.</p> <p>FWS recommends that local Governments and Tribes be engaged where possible to conduct monitoring (e.g., activities on the North Slope). Also, we engage Tribes in studies whenever possible (e.g., in Selawik, residents are providing fish tissue samples as part of a Fish and Wildlife Service study).</p> <p>Through the Natural Resources Inventory and Monitoring Program, NPS is developing baseline</p>   |

|   |   |
|---|---|
|   | water quality data and monitoring water quality in many areas of the State. NPS protocols and water quality data are also available to others.  |
| <b>25. Need to ensure EPA water quality standards are kept to EPA classifications and that all Tribes are educated to those standards</b> | <b>EPA Response:</b> See EPA response to #3.  |
| <b>Subsistence</b>  |   |
| <b>26. What is the process for involving Alaska Tribes and for follow-up?</b>   | <b>DOI Response:</b> The Federal Subsistence Board (FSB) has developed an Interim Tribal Consultation Protocol for use through January 2012, at which time the Interim Protocol will be reviewed with the Tribes for effectiveness, amendment and finalization. The FSB, through member agencies, is also arranging for separate tribal consultation sessions prior to each of the 10 Regional Advisory Council Meetings this fall and winter, 2011.  |
| <b>27. Alaska Tribes need to be at the table where decisions are made in regards to subsistence</b>                                       | <p><b>DOI Response:</b> BLM is engaged in the Federal Subsistence Management Program, initiates Government-to-Government consultation with Alaska Tribes, and invites Tribes to be cooperating agencies on NEPA and planning projects.</p> <p>BIA is very proactive with regard to subsistence and promotes an open dialog with Tribal entities.</p> <p>FWS routinely performs Government- to-Government consultation; Federal subsistence management program.</p> <p>Subsistence harvest on Federal lands in Alaska is overseen through an interagency workgroup. The Federal Subsistence Board adopted a Government-to- Government consultation protocol that will create opportunity for Tribes in Alaska to have meaningful, regular, and effective input to the Board’s process.</p> |
| <b>28. Streamline agency processes</b>  | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We continually strive to streamline processes; however this will take a coordinated effort to assure streamlined processes meet various agency responsibilities and authorities.</p> <p>The BOEM Alaska regional office maintains a “Community Liaison” specifically to assist with capacity building opportunities. We also provide training and actively seek input from public</p>  |

|  |   |
|--|---|
|  | <p>stakeholders and community residents on NEPA documents, Studies Planning, and other proposed actions. In addition, BOEM ESP has insisted that consultants develop capacity building at the local level to assist with contracted social science studies. Through these direct contacts, BOEM builds relationships with communities and Tribes and develops opportunities for more meaningful involvement in agency decisions.</p> <p>FWS has limited ability to streamline many processes due to legal constraints.</p>  |
| <p><b>29. Capacity building for meaningful involvement is needed</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. BLM initiates Government-to-Government consultation, and meets with Tribal and local Governments to identify issues and concerns. Through these direct contacts, BLM builds relationships with communities and Tribes and develops opportunities for more meaningful involvement in BLM decisions.</p> <p>The BIA is actively pursuing its Government-to-Government consultation policies. The BIA is working to reinstate its Tribal Operations Officer position to provide training and outreach to Alaska Tribal governments for capacity building and improvement.</p> <p>USGS has a Tribal Relations Liaisons Team, including an Alaska Native Liaison position.</p> <p>BOEM assisted Aleutians East Borough in its role as cooperating agency on North Aleutian Basin Lease Sale EIS.</p> <p>FWS is working on improved Government-to-Government consultation; better public involvement – especially with Alaska Natives. Regional social scientist and Student Conservation Association interns are developing a guide for staff on ways to have more meaningful involvement.</p> <p>A new position was created in the Alaska Regional Office to assist NPS staff with the development of new methods and procedures for working effectively with rural Alaska communities, and establishing meaningful opportunities to participate in the decision-making process.</p> |
| <p><b>30. Need contaminant source</b></p>                                | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. BLM is thoroughly</p>  |

|   |   |
|---|---|
| <p><b>identification as it relates to potential health effects</b></p>  | <p>studying potential contaminants at the Red Devil Mine site to inform appropriate clean-up actions. BLM is working with other agencies and communities to identify potential health effects. We are also undertaking a survey of Abandoned Mine Lands to determine areas of potential hazards.</p> <p>BIA believes an interagency, open website for tracking all known sources and for reporting new potential sources would be beneficial.</p> <p>USGS is a member of the Alaska Interagency Ecosystem Health Work Group which includes studies of contaminants and effects on human health and impacts on Tribes.</p> <p>FWS performs an ongoing refuge contaminant assessment process; working to assure appropriate remediation occurs.</p> <p>NPS has supported research on local, regional and global distribution of multiple environmental contaminants in Alaska parks (e.g., Western Airborne Contaminants Assessment Project (WACAP) research into airborne contaminants, Red Devil Mine related research of fugitive metal concentrates).</p> <p><b>EPA Response:</b> See EPA response to General Comment #1.</p> |
| <p><b>31. Need for health surveillance</b></p>  |   |
| <p><b>32. Need to resolve issues related to differences in interpretation of environmental and bio-monitoring data (EPA step into doing this)</b></p> | <p><b>EPA Response:</b> See EPA response to General Comment #1.</p>   |
| <p><b>33. Need for information – easy access, improved coordination</b></p>   | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. For the Red Devil Mine project, we are meeting with communities, making regular phone contacts to apprise the community of BLM activities at the site, distributing newsletters and updating websites.</p> <p>The new DOI Consultation Policy will provide additional guidance that will assist agencies in</p>  |

improving coordination.

BOEM ESP already requires sociocultural studies consultants to write a plain language executive summary for stakeholders, which is posted on the BOEM website. BOEM visits relevant communities throughout the life of the study to keep lines of communication open, and provides for local review of studies deliverables. All BOEM NEPA analyses are distributed to interested parties and posted on the BOEM website.

FWS is working on improved Government-to-Government consultation; better public involvement – especially with Alaska Natives; regional social scientist and Student Conservation Association interns are developing a guide for staff on ways to have more meaningful involvement.

North Slope Science Initiative: Federal, State, and local cooperators in the North Slope Science Initiative sponsored a 3-day Science, Natural Resources, and Subsistence workshop on Alaska's Arctic lands and waters in Barrow in March, 2011.

**EPA Response:** EPA Region 10 is committed to meaningful involvement, transparent decision-making and actions informed by public input. We recognize that public involvement, public comment and traditional knowledge need to be valued and reflected in our actions; that whenever possible pertinent information should be easily available to the public; that we have a responsibility to facilitate community participation in decision-making by building community capacity; and that communities often have a stake in decisions and should be involved in those decisions early in the process. EPA Region 10 is also committed to its Tribal consultation responsibilities.

EPA Region 10 carefully considers comments received during public comment processes, including comments from members and organizations of local communities and native villages. For major permit and project decisions, EPA prepares a detailed response to public comments, posted on our website and provided to communities. EPA Region 10 often takes many extra steps to facilitate a more meaningful opportunity for public participation in permitting decisions prior to and during public comment periods, including early informational meetings, quarterly

updates/newsletters, and teleconferences with villages and tribes.

EPA Region 10 provides public comment and tribal consultation opportunities for potentially affected and interested communities and tribal governments to participate in permit decisions and other actions in Alaska. Our *North Slope Communications Protocol*, lays out a number of actions such as planning longer public comment opportunities combined with extra efforts to inform communities early, and multiple opportunities for participation.

EPA entered into a cooperative agreement with the ADEC for a project to enhance tribal access to information and participation in Clean Water Act permitting. The first year of the project resulted in the development of a tribal notification protocol and a website for permit information. <http://www.dec.state.ak.us/water/TribalCommunication/tribes.html>

The current and final year of the project involves cultural competency training of ADEC and other agency staff and internal and external outreach efforts.

EPA Region 10 takes action to ensure Alaska communities have easy access to relevant information on our comprehensive oil and gas sector website. Key documents are emailed or mailed to communities on request. For certain high profile projects, such as permitting activities in the Arctic, EPA sends regular newsletter updates to communities and other stakeholders.

EPA Region 10 is currently exploring existing resources and strategies to identify measures that could be taken to improve technical assistance to Alaska Tribes. Tribes can access technical assistance through direct contact with EPA staff (e.g. assistance from tribal coordinators and media programs). The Indian General Assistance Program (IGAP) is a capacity building program for tribal environmental programs. Tribes with IGAP programs may also include training components in their work plans. Monthly EJ webinars are being held on topics requested by stakeholders. Alaska communities and stakeholders are encouraged to submit topics. EPA also funds partners to provide technical assistance to communities on monitoring, such as Alaska Native Tribal Health Consortium (ANTHC) and the Institute of Tribal Environmental Professionals (ITEP). EPA staff and partners may be able to help with data and document interpretation. Resource extraction and tribal involvement training, among other topics, will be provided at the Alaska Forum on the Environment (AFE) in February 2012.

|  |  |
|--|--|
|  | <p>EPA Region 10 strives to plan public and tribal meetings to meet the needs and interests of the community, and to help make that complex project information accessible and available in varied formats, including small group discussions, presentations and visual displays.</p>  |
| <p><b>34. Fear of over-requests of information</b><br/> <b>• Need to coordinate better on consultation efforts (consultation overload)</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We work with other agencies when appropriate on planning and NEPA documents, which leads to more streamlined and effective consultation. When possible, we coordinate consultation efforts with other agencies to avoid redundancies and meet with communities at times that are most suitable for them.</p> <p>The DOI Native Liaisons and Native Affairs staff are researching more effective alternatives to streamline consultation for Alaska tribes and DOI (and potentially other federal agencies) in the form of an on-line database.</p> <p>USGS appreciates that consultation requests can be overwhelming at times and better coordination is needed.</p> <p>BOEM gathers traditional knowledge and utilizes it in NEPA analyses. As explained earlier, the BOEM ESP has funded a number of successful projects designed to collect and record traditional knowledge, including: case studies and biographies of key informants in the village of Point Lay that have since been incorporated into the public school curriculum; a long-term cooperative agreement with Alaska Department of Fish and Game to produce “biographical jukeboxes” to share information from small villages; a fisheries project pairing ten local experts from Nuiqsut with Western scientists to demonstrate contributions that local experts could make to exchange information and improve understanding of arctic cisco availability in local streams; and multiple ongoing projects to utilize the skills of local hunters as research partners and participants in attaching satellite tags to various species of wildlife (whales, seals, walrus) to support remote data collection.</p> <p>NPS notes that proposed Federal surveys of the public must be reviewed and approved through a rigorous OMB process.</p> |

|  |  |
|--|--|
|  | <p><b>EPA Response:</b> EPA Region 10 is responding to this recommendation by making efforts to coordinate our oil and gas sector outreach and tribal consultation actions, and combine outreach, public and tribal meetings for multiple programs and permit actions. For example, Region 10 air and water permit programs held joint early information meetings on oil and gas sector actions on the North Slope and Northwest Arctic in 2009-2011. <i>(See also the section on consultation for more detail, below)</i></p>   |
| <p><b>35. Consideration of model laws that are working (e.g. Marine Animal Protection Act)</b></p> | <p><b>DOI Response:</b> All relevant laws and the information from their implementation (for example, marine mammal monitoring reports) are used in NEPA analyses conducted by BOEM.</p> <p>Improving Federal subsistence management program, migratory bird co-management council; other FWS successes.</p> <p>NPS managers and planners continually assess the effects of our implementation of laws, policies, and regulations that we are charged with carrying out. There are numerous examples of large scale cooperative efforts for fish and wildlife management. A few include, the Western Arctic Caribou Work Group, Yukon River Work Group, the Forty-Mile Caribou Work Group. All of these groups are led by local community representatives with technical and management support provided by various agencies. Recommendations made through these efforts are typically accepted by the regulatory agency unless legal reasons prohibit that from occurring</p> |
| <p><b>36. Accept traditional knowledge as a more valid source of information</b></p>               | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We are actively seeking and employing traditional knowledge in development of our Rapid Ecoregional Assessments in western Alaska. We have also been incorporating traditional knowledge in development of our planning documents.</p> <p>The USGS Arctic OCS Science Gap Report identified TEK as a critical resource. BOEM gathers traditional knowledge and utilizes it in NEPA analyses.</p> <p>The FWS uses traditional knowledge in Federal subsistence management programs, refuge planning, on-going consultations and communication (e.g., Western Arctic Caribou Herd Working Group and, Nushagak caribou herd management.)</p>   |



|  |  |
|--|--|
|  | NPS seeks and uses information from multiple sources as appropriate to the purpose, including traditional knowledge.   |
| <b>37. System for monitoring fish to better identify and resolve location of problem</b>   | <p><b>DOI Response:</b> BLM has implemented a fish telemetry study (as well as a fish contaminant study) as part of the Red Devil Mine remediation project.</p> <p>BOEM has a socio-cultural study underway to assess coastal Beaufort Sea stakeholder knowledge and views on salmon that have been appearing in greater numbers since 1973. This includes identification of species in English and Inupiq, reported frequency, consumption/use, identification of drainages, etc.</p>   |
| <b>38. More sharing of information, analysis, and Federal policy (coordinated use and definition of traditional knowledge into management)</b> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. For example, BLM shared data and worked closely with Alaska DHSS, ADEC, Fish and Wildlife Service, EPA and ATSDR in developing fish consumption guidelines in the vicinity of the Red Devil Mine site.</p> <p>BIA notes that this is part of our subsistence program and various DOI Tribal consultation work groups.</p> <p>BOEM is a cooperating agency on NEPA analysis to share information and analyses when appropriate, for example, with BLM on the NPR-A IAP/EIS.</p> <p>FWS is working on multiple fronts - see information in other sections of this table on the subject of traditional knowledge and coordination.</p> <p>In Alaska, NPS publishes the Alaska Park Science journal to summarize research information for broad audiences, and makes it available to schools, libraries and the Internet. Data, summaries, and reports from NPS Natural Resources Inventory and Monitoring are available from NPS websites.</p> |
| <b>Contaminants</b>  |  |
| <b>39. Issues and observations Consider social aspects versus technical language and indicators, e.g. parts per billion, parts per</b>         | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. BLM met with communities in the vicinity of the Red Devil Mine site to discuss preliminary fish tissue data and the clean-up process. We developed products that avoided technical jargon, and focused the discussions on community concerns.</p>   |

|  |   |
|--|---|
| <p><b>million.</b></p>   | <p>USGS strives to convey research results in non-technical language appropriate to the targeted audience. USGS fact sheets are also distributed that are non-technical in nature.</p> <p>The BOEM ESP already requires socio-cultural studies consultants and all participants in our Coastal Marine Institute program with University of Alaska Fairbanks to write a plain language executive summary for stakeholders and to conduct local outreach, including visits to the communities or small posters describing the research suitable for dissemination to local communities. In addition, a recent socio-cultural study report titled “Researching Technical Dialogue with Alaskan Coastal Communities” (OCS Study MMS 2009-030) formally researched and documented recommendations for ways that government agencies might improve technical communications with local residents of Alaska’s North Slope Borough.</p> <p>FWS goes to communities to discuss/explain technical data that we and others have collected. Effort is made to explain what data means for residents (e.g., FWS, working with the State Health Department, provided dietary recommendation for consumption of pike due to mercury concerns).</p> <p>NPS recognizes the need to consider the audience when developing new educational and interpretive products, including plain-language summaries of science results.</p> |
| <p><b>40. Health studies on contaminant(s) needed</b></p>                |   |
| <p><b>41. Need technical assistance to understand documents/data</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We strive to produce public documents without technical jargon, and meet with small groups of community members to explain documents. For the Eastern Interior Resource Management Plan, we have committed to meeting with communities multiple times to first introduce planning documents, and we will return at a later time to answer questions about the decisions in the documents. BLM will assist communities to obtain help when they request technical assistance.</p> <p>USGS strives to convey research results in non-technical language appropriate to the targeted audience. USGS factsheets are also distributed that are non-technical in nature.</p>   |

|   |  |
|---|--|
|   | <p>The BIA provides both Tribes and native allotment landowners with any assistance as requested.</p> <p>In conjunction with BOEM public meetings, BOEM offers information sharing sessions to communities on understanding the NEPA process. BOEM will meet, at the community's request, to explain the Bureau's process.</p> <p>FWS provides Refuge information technician programs, community visits, and summary documents in plain English to support for local understanding.</p> <p>NPS scientists and interpreters have worked to produce a variety of plain-language documents to explain results of research and monitoring in the parks, and are usually available to help with questions regarding their interpretation.</p>   |
| <b>Focus on one front</b>   |  |
| <p><b>42. Communication should be translated into action/accountability</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. We develop MOUs with Governments during consultation, and with cooperating agencies. Those MOUs identify responsibilities for the BLM and participating Government entities.</p> <p>The new DOI Consultation Policy sets new guidelines to ensure accountability, improving the current process.</p> <p>BOEM uses public input in formulating NEPA alternatives and mitigation measures for project proposals.</p> <p>Refuge information technicians, Government-to-Government consultations, Native American liaison position, Alaska Native culture and communications training sessions provided. FWS has worked with State Department of Public Health on studies/outreach related to contaminants in subsistence foods, (e.g. FWS studied mercury in pike in the Yukon drainage) and provided dietary recommendations.</p> <p><b>EPA Response:</b> EPA Region 10 is committed to meaningful involvement, transparent decision-making and actions informed by public input. We recognize that public involvement,</p> |

public comment and traditional knowledge need to be valued and reflected in our actions; that whenever possible pertinent information should be easily available to the public; that we have a responsibility to facilitate community participation in decision-making by building community capacity; and that communities often have a stake in decisions and should be involved in those decisions early in the process. EPA Region 10 is also committed to its Tribal consultation responsibilities.

EPA Region 10 carefully considers comments received during public comment processes, including comments from members and organizations of local communities and native villages. For major permit and project decisions, EPA prepares a detailed response to public comments, posted on our website and provided to communities. EPA Region 10 often takes many extra steps to facilitate a more meaningful opportunity for public participation in permitting decisions prior to and during public comment periods, including early informational meetings, quarterly updates/newsletters, and teleconferences with villages and tribes.

EPA Region 10 provides public comment and tribal consultation opportunities for potentially affected and interested communities and tribal governments to participate in permit decisions and other actions in Alaska. Our *North Slope Communications Protocol*, lays out a number of actions such as planning longer public comment opportunities combined with extra efforts to inform communities early, and multiple opportunities for participation.

EPA entered into a cooperative agreement with the ADEC for a project to enhance tribal access to information and participation in Clean Water Act permitting. The first year of the project resulted in the development of a tribal notification protocol and a website for permit information. <http://www.dec.state.ak.us/water/TribalCommunication/tribes.html>

The current and final year of the project involves cultural competency training of ADEC and other agency staff and internal and external outreach efforts.

EPA Region 10 takes action to ensure Alaska communities have easy access to relevant information on our comprehensive oil and gas sector website. Key documents are emailed or mailed to communities on request. For certain high profile projects, such as permitting activities in the Arctic, EPA sends regular newsletter updates to communities and other stakeholders.

|   |  |
|---|--|
|   | <p>EPA Region 10 is currently exploring existing resources and strategies to identify measures that could be taken to improve technical assistance to Alaska Tribes. Tribes can access technical assistance through direct contact with EPA staff (e.g. assistance from tribal coordinators and media programs). The Indian General Assistance Program (IGAP) is a capacity building program for tribal environmental programs. Tribes with IGAP programs may also include training components in their work plans. Monthly EJ webinars are being held on topics requested by stakeholders. Alaska communities and stakeholders are encouraged to submit topics. EPA also funds partners to provide technical assistance to communities on monitoring, such as Alaska Native Tribal Health Consortium (ANTHC) and the Institute of Tribal Environmental Professionals (ITEP). EPA staff and partners may be able to help with data and document interpretation. Resource extraction and tribal involvement training, among other topics, will be provided at the Alaska Forum on the Environment (AFE) in February 2012.</p> <p>EPA Region 10 strives to plan public and tribal meetings to meet the needs and interests of the community, and to help make that complex project information accessible and available in varied formats, including small group discussions, presentations and visual displays.</p> |
| <p><b>43. Need better diagnosis and treatment for environmental health effects (regardless of the source of contamination)</b></p>                            |  |
| <p><b>44. Clean up known contamination with consideration of health and community welfare (cultural traditions) in assessing and cleaning up the site</b></p> | <p><b>DOI Response:</b> Implementing this recommendation is ongoing for BLM. See Red Devil Mine examples. Additionally, BLM is undertaking a multi-year project to survey areas for abandoned mine lands and associated hazards. BLM participates in Formerly Used Defense Sites (FUDS) clean-up efforts, as well as legacy well remediation.</p> <p>The BIA does this as funds are available and staff investigate potential BIA-caused sites, and as tribes request funding.</p> <p>FWS sponsored a study of contaminants on Department of Defense lands at Healy &amp; Dot Lakes).</p> <p>NPS has completed or pressed for multiple environmental cleanup projects of varying scale in</p>  |

|   |   |
|---|---|
|   | and around several parks, including mining waste, fugitive mine dusts, abandoned waste dumps, and marine debris.  |
| <b>Handwritten Comments from One Participant</b>  |   |
| <p><b>Proposal for Tribal Consultation and Data Clearing house</b></p> <ul style="list-style-type: none"> <li>• <b>This entity would supply to all Federal, State, as well as public sector entities, the information they need to conduct meaningful Tribal Consultations as well as public sector contracts</b></li> <li>• <b>This entity would supply:</b> <ul style="list-style-type: none"> <li>• <b>Religious information</b></li> <li>• <b>Cultural and traditional information</b></li> <li>• <b>Subsistence times and activities</b></li> <li>• <b>Current Tribal leadership</b></li> <li>• <b>Ability to make introductions and act as a liaison when requested by a Tribe or entity</b></li> <li>• <b>The Clearinghouse could be established with representatives familiar with already recognized Tribal regions with residency and participation in traditional as well as cultural activities as a prerequisite to</b></li> </ul> </li> </ul> | <p><b>DOI Response:</b> BLM supports these recommendations. We look forward to working with other agencies to further develop a coordinated approach.</p> <p>BIA believes this is a good concept and may be difficult to fund and administer.</p> <p>BOEM is interested in receiving usable information from our stakeholders.</p> <p>FWS supports the concept but expresses concern over costs and how to coordinate. Can Tribes or Tribal entity be the lead on this?</p> <p>DOI developed a Government-to-Government Consultation Policy that requires BIA annual reporting to the White House on DOI's Tribal consultation efforts. Reports will be developed in Washington, DC with input from all DOI regions and agencies.</p> |

**employment not what  
educational degrees they hold**

**• For more ideas or  
conversation on this topic email  
tgreenenanwalek@gmail.com**

### **HHS Environmental Justice Related Activities in Alaska**

- The Centers for Disease Control (CDC) has been collaborating with the Alaska Native Tribal Health Consortium (ANTHC) since 1999. Most recently, these two groups collaborated to incorporate an environmental health component to ANTHC's existing "Four Villages" study. This component aimed to characterize water quality in various surface drinking water sources and other unregulated water sources in four rural Alaska villages; characterize drinking water quality in homes; evaluate household water source, use, storage and handling practices to assess public health risks and develop appropriate public health education messages; and determine if water hauling behaviors or water contamination risks vary between summer and winter seasons. Data collection and analysis of laboratory samples is complete and statistical analysis is underway. The results of the study will provide a comprehensive look at water quality and contamination of drinking water sources (e.g., rivers, wells, tundra ponds, and other surface water sources) used by four select Alaskan villages.
- CDC is using a participatory approach to climate change adaptation planning among Native and non-native Alaskan communities. A program in 6 Native and non-native Alaskan communities utilizes trained community members to monitor and report on surveillance targets/events likely to be associated with climate change using a web-based and paper-based reporting system. The project trains these individuals to collect data and information about unusual behavior and health outcomes of fish and game (such as die offs and migrations), flooding and erosion associated with high rainfall levels, and the disappearance of upland lakes and streams associated with the loss of permafrost and snow cover and other climate/weather related events that have the potential to impact the community's health. These data will identify priority community concerns about the health impacts of climate change and support efforts to develop effective adaptation strategies.

- Under a grant funded by the National Institute of Environmental Health Sciences, Alaska Community Action on Toxics (ACAT) is partnering with 15 communities in the Norton Sound region made up largely of Inupiat and Yupik, indigenous people who depend on the harvest of wild foods to sustain them and their ways of life, to find ways to mitigate and treat health effects from environmental contaminants. This project is funded specifically under the EJ RFA:  
<http://grants.nih.gov/grants/guide/rfa-files/RFA-ES-04-007.html>
- ACAT is also conducting research in partnership with two Yupik villages in St. Lawrence Island to investigate exposures to the endocrine disrupting chemicals (EDCs) polybrominated diphenyl ethers (PBDEs) and perfluorinated compounds (PFCs) in traditional foods (marine mammals and fish), dust, water, and other routes of exposure.
- NIEHS grantee Anthony Ward at the University of Montana is collaborating with the Alaska Native Tribal Health Consortium to implement the Air Toxics under the Big Sky program into seven Alaska native villages. Goals include community education on indoor air quality and development of intervention strategies to improve respiratory health among native Alaska populations.