## Research and planning called inadequate for Beaufort sale

Technological and scientific answers needed on the proposed Joint Federal/State Beaufort Lease Sale scheduled for this December will not be available in time for the sale and perhaps not for another 12 to 18 months, according to a spokesman for the North Slope Borough (NSB).
"To proceed with the sale in the face of the remaining data gaps-which cover important issues such as ice mechanics and oil pollutions studies-may prove costly to all concerned," said

Bill DuBay, NSB public information officer.

Information gaps in the Draft Environmental Impact Statement (DEIS) presently being circulated for public comment indicate the proposed sale may be premature, DuBay said.

According to DuBay, the most significant failure in the DEIS is the lack of attention given to the hazards posed by ice conditions in the Arctic. To local residents, concern about the power and movement of the sea-ice, and industry's lack of experience and proven technology to deal with it, has long been a leading objection to offshore development.

The DEIS itself pointsout that ice "is the most significant constraining factor on development because it is the most distinguishing feature of the Beaufort Sea." But, DuBay says that within the more than 500 pages of the DEIS, less than 13 pages are devoted to descriptions of the ice and its potential as an industrial hazard.

In addition, there is no refer-
ence in the DEIS to any regulations that would require ice conditions to be dealt with or even taken into account, DuBay complained. Although the DEIS states that, "Good all-weather ice reconnaissance and ice fore casting are essential to the efficient and safe operation of such systems," DuBay says the government has done little to support its development.
"Had such a system been in operation in the winter of 75 76 , industry would have been spared the embarrassment and expense of having a whole convoy of supply barges stopped by the ice on the way to Prudhoe Bay, and the ARCO Eas Dock would never have had to be built," DuBay said

Another failure of the DEIS is that it fails to make any note of "data gaps" describing im portant issues still to be answered concerning sea-ice mechanics. "If anything is important to successful industrial operations in the offshore Arctic, it would be sound knowledge about the im pact of the sea-ice on operation
al structures," said DuBay. He said a 1978 interim report prepared by the Outer Continental Shelf Environmental Assessment Program (OCSEAP) warned that:

There has been little consideration given to bridging the gap between the nature of the ice and the effective estimation of the ice-induced loads that a structure will en counter.

A second major fault of the DEIS, according to DuBay, is the failure to accurately describe the boundaries of the Narwhal

Islands Boulder Field in the discussion of Marine Invertebrates. "This oversight could only have resulted from ignoring OCSEAP s Arctic Project report where the known limits of the Boulder Field are clearly drawn."
"Special provisions will have to be made to protect them. DuBay said. "A unique colony of invertebrates exists in the Boulder field, which includes species not found commonly in the Arctic including clams, crabs, sponges, and corals. There is also abundant brown and red
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The ecological importance and ability to withstand dis turbances from oil and gas exploration and development are not yet known," he said.

An alternative mentioned in the DEIS is the possible deletion of the Boulder Field tracts from the sale. But some observers, feel this would be less effective than actually requiring the les sees in the area to protect the field through "mitigating measures" proposed by the state and federal government.
Protection of the fish and widdlife is a prime consideration of any EIS and many pages are devoted to this in the Beaufort Sea report. But DuBay again criticizes the report because not enough information is in the report for a proper evaluation of the impact of the off shore sale. He said descriptions of the food web matrix are inadequate for organisms in the chain below the terrestrial mammal level. "Little is known about the effects of oil-contaminated sediments upon arctic benthic fauna and flora," the report states. DuBay says this is
the result of little research hay ing been conducted on the im pact of oil pollution on key Beaufort Sea organisms. DuBay said also the research presented on the Beaufort birds is out dated.
"Nothing is said about the importance of seal as a key subsistence resource for the coastal residents of the North Slope, es pecially in times when other species are lacking," DuBay argues. "The impact of human dis turbance and oil pollution on seal populations is ambiguous."

Also, claimed DuBay, though the Arctic Cod is mentioned in the DEIS as a key species in the Arctic food chain, there is no mention of the vulnerability of this species to oil pollution. The cod spawns in the ocean and its eggs rise to the surface of the ice,--"right where an oil spil would be waiting," complained DuBay.

SUBSISTENCE

DuBay says the DEIS editors
did not give proper perspective to the Inupiat as part of the Arctic ecosystem. "Their treatment of subsistence generally draws upon outdated sociolog cal views which failed to reco nize the dynamic nature of Es. kimo culture," DuBay said. He is particularly critical of a section of the report whieh states:

The subsistence hunters today who use snowmobiles, high powered rifles with scopes, outboard motors, har poons with explosive head and 2-way radios are en gaging in a qualitatively dif ferent lifestyle than the sub sistence hunters of a decade ago. The significant difference is in the urban processes ence is inter engages in to ac the hunter engages in to ac-
quire, maintain, and use modern technological tools.

Ever since western contact in the early 19th century with the North Slope villages, there has been a gradual but steady movement away from subsistence living and towards a cash lifestyle
"The implications of this type of thinking are 1) There were no changes in Eskimo cul ture before the coming of the white man and that industrial technology has made it dynamic; 2) The use of modern tech nology erodes subsistence rights and values; 3) Subsistence somehow is not cost-efficient; and 4) Modern industry, therefore, has
a prior right to "take" or displace subsistence resources," said DuBay.

He added that the statesments ignore the conclusions of social scientists and even contradict the research funded by the OCS program as in OCS Technical Report: Assessment of Change in the North Slope, Beaufort Sea Region, Sociocultural Systems, submitted by Peat, Marwick, Mitchell \& Co.

## According to that report:

The common interpretation of acculuration has tended to view traditional societies as becoming more like modern societies, progressing on a unilinieal continuum from traditional to modern. The sociocultural description of the Beaufort Sea Region attempts to describe a society in institutions and symbols while assigning traditional meanings to them. The Inupiat appear to be attempting to delegate new or traditional functions to western institutions as they incorporate them into their system of social relationships and cultural values..

After 150 years of contact with Western influences, the Inupiat presently exist as a distinct cultural enclave within the larger society of Alaska and the United States. Outwardly, the manifestations of Westernization are
dance of modern goods and services, institutions, and houses and a monetary economy. However, while the $a b$ original culture has incor porated and integrated nu merous elements of Western culture, it persists as a char acteristically Inupiat society...

The tenacity of Inupiat cul tural survival has been attributed to their continued relationship to the land and their environment and the continuation of their traditional social organization in the family and community... While many technological innovations have been adopted. thers have been rejected or modified, and traditional hunting patterns continue to overn subsistence activities. The cultural values of coopeation and sharing persist into the present day and strengthen the family and community organization...

DuBay said also the report's reatment of the possibilities of il spills is "out of touch and mystical." The scenarios it runs are all based on the best possible conditions, whereas a realistic approach would demand a scenario based on the worst possible conditions, according to DuBay. "The history of industry has taught us that in the long run, we can expect the impossible thing to happen as in Three-Mile Island, the AmocoCadiz, Pump Station No. 8, and a sabatoged Trans-Alaska Pipeline. DEIS statements such as "A major oil spill is unlikely" carries little scientific force and further reduces the credibility of the report," said DuBay.
"The air of unreality is enhanced by the use of statistical information on oil spills from the Gulf of Mexico," complained DuBay. He called this an improper use of information and said it called into question the scientific reliability of the report.
"The question is not whether the Arctic will have a major oil spill, but whether it can survive a major oil spill along with the chronic industrial spills that continue to take place," said DuBay. "As with other information coming from industry such as the research on drilling muds - we cannot afford merely to take industry's word on such important matters."

DuBay complained and said it was unfortunate that the North Slope Borough's recommendations taken from its Coastal Zone Management Plan for the Prudhoe Bay Area were not given consideration in the "Alternatives to the Proposed Acion" in the DEIS report. He was particularly critical of the fact that the NSB proposals were listed instead under "Factors Which Constrain Development" which, according to DuBay, gives the impression that the Borough is taking an obstructionist stand rather than merely insisting on limiting the sale to proven technologies.
"While the DEIS has presented some information on a variety of subjects, it has not been honest in telling the public about what is known about what is going to happen in the event of a sale. Even worse, it has not informed the public about what is not known, and this may prove to be of even more importance," DuBay concluded.

