

March 9, 2018

Ms. Kelly Hammerle
Chief, National Oil and Gas Leasing Program Development and Coordination Branch
Leasing Division, Office of Strategic Resources
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Re: 2019-2024 National OCS Oil and Gas Proposed Program

Dear Ms. Hammerle,

Voice of the Arctic Iñupiat (VOICE) writes you today to express our concern for the 2019-2024 National Outer Continental Shelf (OCS) Oil and Gas Leasing Draft Proposed Program (DPP) announced on January 4, 2018 by the Bureau of Ocean Energy Management (BOEM), specifically the inclusion of the 25 Mile Chukchi Sea Buffer, Barrow Whaling Area, Kaktovik Whaling Area in Option 1 for leasing.

VOICE is a 501(c)4 non-profit corporation whose twenty members include representatives from Alaska's North Slope tribal councils, municipal governments, Alaska Native Corporations, a regional non-profit, and the tribal college from the North Slope of Alaska. Together, we represent the broad leadership of the North Slope of Alaska and are active participant in several Department policies and agenda items that affect our region, often engaging locally with Department staff or in Washington D.C. with Department leadership. Most recently VOICE actively campaigned Congress on the opening of the Arctic National Wildlife Refuge to oil and gas leasing and development with success.

Although VOICE has yet to take a position on resource development in the Arctic OCS, many of our members have and we feel our unified voice is critical in all matters that could affect our region, whether in a positive or negative manner. We understand better than most that the opportunity of resource development and environmental protections and subsistence are not mutually exclusive but there is balance that must be managed with the guidance of science and Traditional Knowledge. ***Meaningful consultation is key to this balance and with respect the***

Arctic OCS announcement on the DPP we feel the concerns of the local organizations were ignored and that deeply disturbs us.

While VOICE is supportive of safe and culturally responsible resource development in our region, we recognize that these activities can only be allowed to occur when the preservation of our way of life, our food security, and our subsistence culture are the highest priorities. Our present day leadership and leaders of past have worked tirelessly since the discovery of Prudhoe Bay to install safeguards to create this balance of our culture and way of life while facilitating the vibrant activity in our region, to local, state, and national benefit. The success of these efforts is a testament to the close consultation, collaboration, and engagement among agencies, industry partners, and the local people. A prime example of this successful collaboration is the Open Water Season Conflict Avoidance Agreement (CAA), which for more than 30 years has enabled subsistence hunters and offshore oil and gas developers to share the waters of the Arctic. Our work has led to the legacy of safe development in our region and the many mitigation measures designed to minimize impacts to subsistence activities and the local people which have now become the standard for Arctic development and incorporated into every project in our region.

Onshore, we have worked collaboratively with industry and agency partners to establish mechanisms like elevated pipelines and distance between pipelines and roads to minimize potential impacts to migrating caribou that many Alaska Natives rely on to feed their families. In the offshore, subsistence is of great importance as the majority of our communities rely on the bowhead whale, other marine mammals, fish, and water fowl for sustenance. We recognize that the balance between subsistence and resource development activities can and does occur because we have worked diligently to establish it.

For this reason, we were alarmed that subsistence use areas which are critical to northern Alaska food security and have been identified and agreed to through previous planning processes, resulting in exclusion from earlier leasing programs, were not upheld in the Option 1 of the DPP. VOICE understands that BOEM's leasing program is a winnowing process and that the agency seeks to evaluate the entire potential of the OCS prior to narrowing its focus. However, ***we do not agree with the inclusion of critical subsistence use areas whose longstanding exclusion is the result of many years of consultation between DOI and Alaska Natives. Specifically, the Chukchi Sea 25 Mile Costal Buffer, the***

Barrow Whaling Area, and the Kaktovik Whaling Area should be preserved from the outset of the Proposed Program. Another area unmentioned in the DPP is area surrounding Cross Island where hunters from Nuiqsut utilize. VOICE expects BOEM to work closely with the Nuiqsut Whaling Captain Association and Alaska Eskimo Whaling Commission to determine whether Cross Island requires certain protections or if the hunt in this area can be successfully managed locally by the Conflict Avoidance Agreement.

As acknowledged in the Draft Proposed Program, the North Slope Borough, Alaska Eskimo Whaling Commission, and Arctic Slope Regional Corporation all raised the critical importance of preserving the Chukchi Sea 25 mi Coastal Buffer, Barrow Whaling Area, and Kaktovik Whaling area in BOEM's Request for Information for the 2019-2024 Leasing Program. Collectively, these three organizations – the regional municipal government, the regional Alaska Native Corporation, and the regional Alaska Native co-management organization for the bowhead whale – defend the interest of the region's residents, including the Iñupiat people of the North Slope. We stand with these North Slope organizations, and we expect BOEM to consult with and collaborate with each of these organizations in order for BOEM to better understand the subsistence and food security needs of our communities and to develop a balanced, safe, and culturally responsible 2019-2024 OCS Leasing Program.

VOICE has also advocated to Secretary Zinke to honor the longstanding commitments between the Department and Alaska Natives and uphold these exclusion areas in all Leasing Programs. Though Option 2 has identified these three areas (as well as others) as potential exclusion areas, VOICE does not feel this is satisfactory. These areas which have been excluded from leasing for over 15 years and based on strong collaboration with local people should not be optional for leasing. It is inappropriate for these areas to be included at any stage of BOEM's Leasing Program.

Therefore, VOICE encourages you and your administration to prioritize the Iñupiat people and our unique expertise and experience as you evaluate the Arctic potential and Arctic policy. Decisions and activity in our region must be based on consultation, coordination and engagement with Alaska Natives. ***VOICE encourages BOEM to preserve these areas designated for subsistence in the Proposed Program and to avoid overlooking the legacy of balance which Alaska Natives,***

the Department of Interior, and industry partners have worked to established onshore and offshore. VOICE cannot and will not support a Leasing Program that does not respect our subsistence way of life. We look forward to working with you to accomplish these goals for better collaboration, coordination, and self-determination in the Arctic.

Taikuu,



Sayers Tuzroyluk, Sr.
President

CC: Walter Cruickshanks, Acting Director of BOEM
Joe Balash, Assistant Secretary of Lands and Mineral Management
Steve Wackowski, Senior Advisor to the Secretary for Alaska Affairs
Vince DeVito, Counselor to the Secretary on Energy Policy