ALASKA MARINE
COMMUNITY COALITION

January 21, 2026

Ms. Kelly Hammerle
Bureau of Ocean Energy Management (VAM–LD)
45600 Woodland Road
Sterling, VA 20166-9216

Re: Comments on the 11th National Outer Continental Shelf Oil and Gas Leasing Program – Draft Proposed Program

Dear Ms. Hammerle:

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment on the Department of the Interior's Draft Proposed Program for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program.

AMCC is a statewide coalition of fishermen, coastal community leaders, Tribal members, researchers, and marine advocates working to sustain healthy oceans and the fisheries-dependent communities that rely on them. For Alaska, marine ecosystems are not abstract resources; they are the foundation of local economies, food security, and cultural continuity.

Alaska's fisheries represent the most productive wild seafood system in the United States. According to the Alaska Seafood Marketing Institute, on average, Alaska's seafood industry directly employs approximately 48,000 workers, contributes nearly $6 billion in annual economic output, and generates $2.3 billion in labor income, with benefits extending to coastal, rural, and urban communities alike. In many coastal communities, fisheries are the primary employer and the largest source of local tax revenue, supporting essential services including schools, utilities, and infrastructure

The waters proposed for offshore oil and gas leasing—including the Bering Sea, Aleutian Islands, Gulf of Alaska, and Arctic regions—are the core production areas for these fisheries. They support commercial, subsistence, and cultural harvests that have sustained communities for generations and continue to feed the nation today. These ecosystems are already experiencing accelerating stress from ecosystem change, warming oceans, and ecological shifts. Introducing new offshore oil and gas activity into these systems adds unnecessary risk to resources that are already under pressure.

Importantly, protecting fisheries in these regions is fully aligned with federal policy priorities articulated under the Trump Administration. Executive Order 13921, *Promoting American Seafood Competitiveness and Economic Growth* (2020), explicitly recognized U.S. fisheries as a strategic national asset and directed federal agencies to support domestic seafood production, fishing communities, and working waterfronts. That Order emphasized reducing regulatory and environmental barriers that undermine American seafood producers and strengthening domestic supply chains to improve food security and economic resilience.

Allowing offshore oil and gas leasing in Alaska's most productive fishing grounds runs counter to those objectives. Offshore oil and gas activities introduce risks of chronic noise, water, and air pollution, increased vessel traffic, and gear conflicts, as well as the potential for catastrophic spills—each of which threatens fish habitat, disrupts harvests, and undermines the clean-water reputation on which Alaska seafood depends in domestic and global markets. These risks directly jeopardize the competitiveness of American seafood producers and the stability of fisheries-based supply chains the Executive Order sought to strengthen.

Moreover, the Draft Proposed Program itself acknowledges that most Alaska planning areas have negligible oil and gas resources or negligible development value, while industry interest in leasing has been limited. In contrast, the economic, cultural, and food-system value of these waters to fisheries is proven, renewable, and enduring. From a cost-benefit perspective, risking a globally significant seafood economy for speculative offshore oil and gas development is inconsistent with both economic prudence and stated federal priorities.

For fish-dependent communities, this is not an abstract policy debate. It is a question of whether federal decision-making will meaningfully account for livelihoods rooted in renewable resources, domestic food production, and long-term community resilience. Protecting Alaska's fisheries is not anti-development; it is pro-American seafood, pro-jobs, and pro-working-waterfront.

For these reasons, the Alaska Marine Community Coalition respectfully urges the Department of the Interior to remove Alaska program areas from further consideration in the 11th National OCS Oil and Gas Leasing Program and to prioritize policies that uphold the federal commitment to sustaining America's fisheries, seafood workers, and coastal communities.

Thank you for considering these comments and for your attention to the long-term health of Alaska's oceans and the people who depend on them.

Sincerely,

Michelle Stratton

Michelle Stratton
Executive Director

Jamie O'Connor
Deputy Executive Director