NATIVE VILLAGE OF KOTZEBUE
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Tribal Government serving the Iñupiaq people of Qikiqtaġruk.

January 21, 2026

Kelly Hammerle
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216
telephone (703) 342-8867

RE: BOEM-2025-0483-0001: 11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program: 1st Analysis and Proposal MAA104000

Dear Ms. Hammerle,

The Native Village of Kotzebue appreciates the opportunity to comment on the **11th National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program: 1st Analysis and Proposal MAA104000**. In particular we are focused on the lease sales proposed in the Bering, Chukchi, and Beaufort Seas. The Tribe represents Iñupiaq people living on the shores of Kotzebue Sound in northwest Alaska whose ancestors have lived here for thousands of years. Our Tribal members rely on Kotzebue Sound and the Bering, Chukchi, and Beaufort Seas, for the fish and wildlife living in these waters, in order to sustain life, participate fully in their cultural heritage, and meet their economic, spiritual, and nutritional needs.

Climate change made worse through continued extraction and burning of fossil fuels, has already been disrupting the ecology in these Alaska seas and contributing to the rapid decline in some stocks of fish and threatening the long-term persistence of marine mammals. This has posed real food security concerns for all people living along the coast of western Alaska, in addition to negative impacts to economic security with the commercial collapse of many salmon runs on the west coast of Alaska. Beyond contributing to the disappearance of critical fish stocks already, climate change has been intensifying fall time storms that are threatening our community with catastrophic flooding, along with all the other coastal western Alaska communities, as was made clear

this last fall in the Yukon Delta area where entire communities were inundated leaving people homeless. The warming waters from climate change are also unleashing harmful algae blooms in all of these Alaska Seas and facilitating the spread of viruses, both of which are harming and killing marine mammals and birds, creating more food security issues for coastal Alaska communities.

Beyond the contributions to climate change that continued opening up of new oil and gas reserves represents, pursuing these reserves offshore of Alaska in the relatively pristine Arctic waters creates multiple opportunities for harm of fish and marine mammals through underwater noise, water pollution, ship strikes, and the constant risk of catastrophic oil spills, which for most of the year would be uncontrollable because of the presence of ice, remote operation areas with minimal support, and the commonly occurring extreme weather events. We have covered all this in length through multiple past comment submissions to MMS, BOEM, and BSEE, beginning with the 2005 Chukchi Lease Sale 193 EIS, and going on until all the oil companies pulled out in September 2015. We would note that all the reasons oil companies quit pursuing offshore development in these waters are still present today, as are our concerns, which if anything have grown more alarming.

In summary, the waters surrounding Alaska are already suffering multiple real negative impacts from human activity and climate change and the fish and wildlife are already being harmed, in some cases drastically. Ramping up industrial activity in these waters will compound these harms, especially when that activity is extraction of oil and gas which will then be added to the global load of carbon, causing additional climate change. This continued climate change will lead to further negative impacts to western Alaska marine ecology and the fish and wildlife all coastal Alaska communities depend on and continue to create longer ice free seasons and stronger fall time storms, with increasing risk for catastrophic flooding of communities.

Thank you for considering our analysis of the 11th National proposed program of Outer Continental Shelf Oil and Gas Leasing.

Sincerely,

Alex Whiting
Environmental Program Director