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January 23, 2026

Secretary Doug Burgum
Department of Interior
1849 C Street, NW
Washington DC 20240

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

Re: Docket ID: BOEM-2025-0483; Draft Proposed Program (DPP) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (11th Program or National OCS Program)

Dear Secretary Burgum and Ms. Hammerle,

Thank you for the opportunity to provide comments on the Draft Proposed Program (DPP) for the 11th National Outer Continental Shelf (OCS) Oil and Gas Leasing Program (11th Program or National OCS Program).

World Wildlife Fund understands the importance of energy security and local to global economic prosperity. Nonetheless, we have concerns about significantly expanding offshore oil and gas drilling in Alaska's public waters because of the risks it poses to Alaskans and its economy if an accident were to happen.

This draft offshore leasing proposal would open up highly sensitive waters off Alaska. This proposal would potentially impact thousands of people in Alaska that depend on resilient coastlines, thriving marine wildlife, healthy fisheries, and clean beaches to protect them and keep their economies running. Alaska’s Indigenous Peoples have lived off the Bering Sea and its bounties for countless generations. Many of the region’s Tribes have opposed offshore leasing and exploration since the 1980s. For four decades they have stood unified in their opposition due to the grave threats it poses to their traditional ways of life. The

Bering, Chukchi, and Beaufort Seas are both a vital food source and an irreplicable connection to their cultures. World Wildlife Fund supports the requests of the Bering Sea Elders Group, Kawerak, Inc., and the Association of Village Council Presidents to exclude waters important to the Indigenous Peoples of Alaska from the National OCS Oil and Gas Leasing Program.

Oil and gas activities pose significant and distinct risks to the unique and important ecosystems in the Arctic Ocean. Oil and gas activities put the health of these ecosystems at risk. Of particular concern, is that responders would not be able to effectively address a major oil spill in real-world Arctic conditions. The 2010 BP Deepwater Horizon disaster in the Gulf of Mexico highlighted the difficulty of spill response even in comparatively favorable conditions. A report by the National Research Council concluded that cleaning up a major oil spill in the Arctic would be much more challenging. The Department of Interior itself has recognized these particular risks; the lessons from the Deepwater Horizon spill and Shell's failed exploration efforts led the Department of the Interior to promulgate Arctic-specific prevention and response rules.

The lack of infrastructure in the Arctic also makes it a poor candidate for OCS development—and would make spill response especially difficult. A National Research Council report found that "[t]he lack of infrastructure in the Arctic would be a significant liability in the event of a large oil spill," that building the requisite spill response capacity "will require significant investment in physical infrastructure and human capabilities," and that "[t]here is presently no funding mechanism to provide for development, deployment, and maintenance of temporary and permanent infrastructure."[1]

The best available science confirms that certain areas of Chukchi and Beaufort Seas are particularly important to the health and functioning of the marine ecosystem and have significant environmental values that could be compromised by industrial activities. Instead of being considered for leasing, the Department should afford these areas the strongest possible protection from OCS oil and gas activities.

As we have seen in the past, catastrophic oil spills cause ecological collapse, threaten public health and safety, devastate local businesses, and damage regional economies for decades. Expanding offshore drilling into new waters, and especially Arctic waters that are covered with ice for much of the year, significantly increases the risk of another spill, which

[1] National Research Council. 2014. Responding to Oil Spills in the US Arctic Marine Environment. National Academy of Sciences, Washington, DC.

is dangerous given the limited available capacity for spill response efforts. If an oil spill occurs where there is no response infrastructure in place, cleanup could prove to be impossible.

The administration's draft proposal should not include new lease sales in the U.S. Arctic. We reiterate our support for requests made by local tribes and communities which urge Interior to exclude planning areas in Arctic waters. Excluding these areas is the best way to safeguard the resilience, stability, and security of the Arctic Ocean and the communities that depend on a healthy ecosystem. We urge the Administration to reconsider this expansion of offshore drilling and protect the coasts that thousands of Alaskans depend on.

Sincerely,

Steve MacLean
Managing Director, U.S. Arctic Program
World Wildlife Fund