January 22nd, 2026

Matthew Giacona, Acting Director
C/O Kelly Hammerle, Program Manager
Bureau of Ocean Energy Management
United States Dept. of Interior
45600 Woodland Road
Sterling, VA 20166-9216

RE: Comments Regarding the 11th National Outer Continental Shelf Oil and Gas Leasing Program – *Submitted via Regulations.gov.*

Dear Acting Director Giacona,

We are writing on behalf of the Arctic-Yukon-Kuskokwim Tribal Consortium (AYKTC) to share our concerns regarding the potential for lease sales in Alaskan Waters proposed within the draft of the 11th National Outer Continental Shelf Oil and Gas Leasing Program (Proposed Program). We appreciate the opportunity to provide comments on this program draft.

The Arctic-Yukon-Kuskokwim Tribal Consortium (AYKTC) represents 98 Alaska Native Tribes across the AYK Region. Our work focuses on advocating for the conservation of the Bering Sea Ecosystem, consideration of Traditional Knowledge in fishery decision-making, and the protection of subsistence opportunities for Tribal citizens and rural communities.

We are "Salmon People," and our communal health and wellbeing is tied to that of the Bering Sea and connected rivers that sustain our subsistence foods. Our Member Tribes, spanning from coast to headwaters, depend on subsistence harvest for community health, food security, and to practice traditional ways of life. We established the AYKTC to safeguard these practices for present and future generations, particularly in the light of the ongoing multi-species decline of salmon in our region. It is therefore vital to our member organizations and their Tribes that all habitats vital to the health and wellbeing of AYK salmon be conserved and protected.

The proposed oil and gas leasing program would include lease sales in Alaskan waters beginning in 2026 and encompassing almost all offshore areas in Alaska. These leases, if sold, would threaten the delicate marine ecosystem on which Pacific salmon depend. In particular, the ten proposed leasing areas in the Bering Sea, Aleutian Islands, and Gulf of Alaska—some of which have been withdrawn from oil and gas leasing and are therefore ineligible for inclusion in the Proposed Program—include Essential Fish Habitat (EFH) for the salmon populations that return and spawn in the Arctic-Yukon-Kuskokwim region. Oil and gas exploration and development activities will seriously affect ecosystem health of these sensitive areas, particularly in regions that are already struggling due to negative impacts from industrial trawling and other commercial

activities. Any adverse impacts created by oil and gas exploration and development activities in these areas would affect not only salmon populations themselves but also the health, food security, and traditional practices of our member Tribes.

Because of the significant ecological risks associated with oil and gas exploration and development in this region, as well as the resulting threat towards subsistence resources, we join with our Tribal peers and Alaskan communities across the state to urge you to remove all proposed leasing areas in the Bering Sea, Aleutian Islands, and Gulf of Alaska from the Proposed Program.

Thank you for considering our comments.

Sincerely,

Vivian Korthuis, CEO
Association of Village Council Presidents

Kevin Whitworth, Executive Director
Kuskokwim River Inter-Tribal Fish Commission

Robert Charles Wright, Sr., Chair
Yukon River Inter-Tribal Fish Commission