



CITY OF UTQIAGVIK

"Farthest North Incorporated City"

October 19, 2023

Mr. Steve Cohn
Alaska State Director
Bureau of Land Management
222 W. 7th Avenue
Number 13
Anchorage, AK 99513

Re: Requests for a 120-day extension of the deadline for comments on the BLM's Coastal Plain Draft SEIS and for in-person consultation with decision makers

Submitted via email to: scohn@blm.gov

Dear Mr. Cohn,

I write to request in-person consultation with decision-makers and a 120-day extension of the deadline for comments on the U.S. Bureau of Land Management (BLM)'s Draft Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact Study (SEIS). For a number of reasons, BLM has not provided sufficient time for North Slope communities to properly digest or consider the full 1,400-page document.

Although the notice of availability for the Draft SEIS was posted on September 8, 2023, our community only recently emerged from a three-month, region-wide broadband crisis that left an area the size of Minnesota with patchwork connectivity and download speeds unable to accommodate the lengthy Draft SEIS document.

Local service was restored on September 19. This was only six days before BLM's scheduled the first "public meeting" in Utqiagvik on September 25th, for which North Slope leaders and community members only had two business days' notice to begin with. Our regional and community leaders were no able to offer meaningful feedback on the Draft SEIS, as some of them were given a physical copy of the document at the meeting. Additionally, only about seven community members attended the meeting given the short notice, community members participating in fall subsistence activities, and other previously scheduled community events happening at the same time.

The people this unilateral decision affects the most are expected to read, digest, and provide meaningful feedback in an unreasonably short timeline. If that isn't arbitrary enough, the current public comment period directly coincides with vital subsistence activities underway in North

Slope coastal villages. Our community is currently engaged with fall whaling. It is imperative that the administration observe the timing of our subsistence traditions when planning its public consultation period, whether the request for comment or in-person public meetings, on issues with a profound impact on our communities.

Ironic that Kaktovik caught their first fall whale the same day of the September 6th announcement affecting the Arctic National Wildlife Refuge (ANWR) and the National Petroleum Reserve in Alaska (NPR-A). Kaktovik, the only community located within ANWR and the 1002 Area, was caught off guard like the rest of us by the administration's surprise decision to take nearly 13 million acres within the NPR-A and adjacent waters into a special protected status, and the foreclosure of leases within the 1002 Area of the coastal plain of ANWR.

This announcement was made by the federal government without warning or consulting the North Slope Iñupiat. Despite living in these lands since time immemorial, we learned of the decision through the press, rather than from the administration itself.

This is no way to partner with Alaska Native communities. Going forward, we urge the BLM to do better in what is clearly an inconsistent and uneven relationship with the North Slope Iñupiat.

In light of the above subsistence, access, and timing challenges, it is clear that our communities will require more than 45, now 60, days to fully engage with BLM on the Draft SEIS. That is why I am requesting an in-person consultation with decision-makers and a 120-day extension to the comment period.

Thank you for considering our request.

Sincerely,



Asisaun Toovak
Mayor