



November 2, 2023

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

Re: Request for a 90-day extension of the deadline for comments on the BLM's Proposed Rule for the Management and Protection of the National Petroleum Reserve: Alaska, and for in-person consultation with decision makers.

Submitted via email to: scohn@blm.gov

Dear Mr. Cohn,

Ukpeagvik Iñupiat Corporation does not believe that the BLM has met its obligations to provide for adequate or meaningful consultation for North Slope communities and has not provided sufficient time for the affected parties to properly digest or consider the full implications of the U.S. Bureau of Land Management (BLM)'s Proposed Rule for the Management and Protection of the National Petroleum Reserve in Alaska (NPR-A). We write to **request a minimum 90-day extension of the deadline for comments on the Proposed Rule**, in addition to the 10-day extension that was just announced. We are also formally requesting **in-person consultation with the decision makers on the Proposed Rule**.

Although the notice of availability for the Proposed Rule was posted on September 7, 2023, our community only recently emerged from a three-month, region-wide broadband crisis. That communication outage left an area the size of Minnesota with patchwork connectivity and download speeds that did not accommodate viewing the Proposed Rule. During this period, most of our on-slope leaders and residents struggled to make phone calls and send text messages, let alone download the relevant volumes of documents or to participate in video calls.

Local internet and telephone service was only restored as of September 19. We understand the only two North Slope community meetings for Atqasuk and Nuiqsut were cancelled. We also understand that the first North Slope meetings are now scheduled for this week, only a few days within the original deadline and just weeks before the amended deadline. Our communities have not had sufficient access nor time to review the Proposed Rule and, as a result, we are hard-pressed to offer meaningful feedback within this comment period offered, particularly in light of how it was implemented by the agency.

The people this Proposed Rule affects the most are expected to read, digest, and provide meaningful feedback in an unreasonably short amount of time. If the timeline isn't arbitrary enough, the current public comment period directly coincides with vital subsistence activities underway in North Slope coastal villages. It is imperative that the administration observes 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.

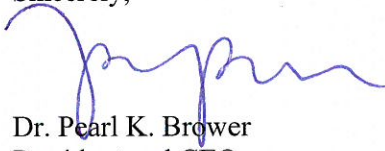
This announcement was made by the federal government without warning or consulting the North Slope Iñupiat. Despite living in these lands since time immemorial, our region learned of the decision through the press, rather than from the administration itself.

This is no way to partner with Alaska Native communities, particularly those who reside within the NPR-A boundaries themselves. 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 70 days to fully digest and engage with BLM on the Proposed Rule. In line with the extension the NPR-A Working Group is requesting, **the Ukpeaġvik Iñupiat Corporation requests a 90-day extension to the comment period and in-person consultation with decision makers.**

We look forward to receiving your response and thank you for considering this request.

Sincerely,



Dr. Pearl K. Brower
President and CEO