



Village of Wainwright

PO BOX 143 * 1212 AIRPORT ROAD * WAINWRIGHT, ALASKA 99782

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

November 2, 2023

Re: Requests 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,

Village of Wainwright, for a number of reasons, believes BLM has not provided sufficient time for North Slope communities 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). I/we write to request a 90-day extension of the deadline for comments on the Proposed Rule, in addition to the 10-day extension that was just announced, and in-person consultation with decision makers.

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 left an area the size of Minnesota with patchwork connectivity and download speeds unable to accommodate the Proposed Rule. Local internet and telephone service was restored on September 19. Our community has not had sufficient access nor time to review the Proposed Rule and, as a result, we are hard-pressed to offer meaningful feedback within the short 60-day comment period offered.

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, 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 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 Village of Wainwright requests a 90-day extension to the comment period and in-person consultation with decision makers.

Thank you for considering our request.

Sincerely,

Billy B. Patkotak Jr., President
Village of Wainwright