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August 3, 2017

Ms. Kelly Hammerle, National Program Manager
Bureau of Ocean Energy Management
45600 Woodland Road, Mailstop VAM-LD,
Sterling, VA 20166

**RE: Request for Information and Comments on the Preparation of the 2019–2024
National Outer Continental Shelf Oil and Gas Leasing Program**

Dear Ms. Hammerle,

Kawerak is the regional non-profit tribal consortium for the Bering Strait region¹. Kawerak is providing comments to the Bureau of Ocean Energy Management's (BOEM) request for information per the notice of July 3, 2017. Kawerak appreciates the opportunity to make comments to BOEM and hopes our letter will help inform BOEM as it considers its Oil and Gas Leasing program.

We do not see a reason to change the current oil and gas management plan for federal waters in our region. The current 2017-2022 Five-Year Program does not include sales in our region, and we encourage you to maintain that approach. Should you revise the current management plan, we urge you to exclude the Hope, Norton, St. Mathew Hall, and Navarin Basin Planning Areas from any new plans. We do not support leasing in any of those Planning Areas.

We do encourage you to incorporate indigenous knowledge in this and future decisions, and look forward to working cooperatively with you to ensure meaningful consultation processes.

The Kawerak Region

Kawerak represents 20 tribes in the Northern Bering Sea Region. Our communities and members depend on the ocean resources. We have for millennia and will continue to do so as long as we are able.

The northern Bering Sea and southern Chukchi Sea are vitally important to indigenous people and rural Alaskan communities and must be protected². Kawerak has participated in several well thought-out risk analyses in the past several years and collected an enormous amount of information which we have compiled into well-regarded synthesis documents.

¹ www.kawerak.org

² J. Raymond-Yakoubian. 2016. Conceptual and institutional frameworks for protected areas and the status of indigenous involvement: Considerations for the Bering Strait Region of Alaska. In T. Herrmann and T. Martin (Eds.), *Indigenous Peoples' Governance of Land and Protected Territories in the Circumpolar Arctic*. Springer: Switzerland. Pp:83-103.

The Kawerak Board of Directors supported the oil and gas lease withdrawals that were made in Executive Order 13754 which established the Northern Bering Sea Climate Resilience Area. Over several decades, as we have been advocating for tribes, several issues have become quite clear through our community-based work. For example:

1. Tribes desire no discharge of any kind into our waters, even if discharge may be legally done.
2. Oil spills regularly happen, and activities (such as leasing), which increases the likelihood of a major oil spill, are too great a risk.
3. Increased ship traffic impacts marine mammals; therefore increased ship strikes and noise impacts must be mitigated.

Based upon the full suite of risks of an oil and gas leasing program, and in light of increased shipping taking place, Kawerak believes there is much at stake. There are many potential negative consequences³ of increased ship traffic. Kawerak's workshop reports and policy recommendations on shipping seek to protect our way of life⁴ and its fragile ecosystems. From a food security and environmental justice perspective we believe we have a distinct⁵ perspective that must be considered to guide federal decision-making.

Over the last several years Kawerak hosted a series of *Bering Strait Voices* workshops in Nome^{6,7,8} which brought together local residents and ocean policy experts. Those gatherings reiterated the concerns above and reinforced our belief that it is necessary to fully define risks and not underestimate the potential great impacts to our ecosystems and people.

Concerns about negative impacts to our way of life, low income and minority population were likely considerations when participants in our workshops made profound statements about the risks associated with leasing, exploration and development activities. It is no secret that longstanding disproportionate impacts have occurred to Alaska Native people. These Environmental Justice factors must be considered. The region's unemployment rate, which is astonishingly higher than other parts of the nation, means that food from the land and sea are vital for food security.

Opposition to lease sales in the Hope, Norton, St. Mathew Hall, and Navarin Basins.

Our comment letter is submitted with the best interests of our tribes and the needs of rural communities in mind. Kawerak has documented the concern and needs of tribes over several decades.

³ Ocean Conservancy. (2017). Navigating the North: An Assessment of the Environmental Risks of Arctic Vessel Traffic. Anchorage, AK.

⁴ Kawerak. 2013. Policy Based Recommendations. Nome, AK.

⁵ Inuit Circumpolar Council. 2016. Inuit Arctic Policy

⁶ Kawerak. 2014. Bering Strait Voices on Arctic Shipping Workshop Report. Nome, AK.

⁷ Kawerak. 2016. Bering Strait Voices on Arctic Shipping Workshop Report. Nome, AK.

⁸ Kawerak. 2016. Bering Strait Voices Vision for Action Summit. Nome, AK.

The last time exploration for oil and gas was done in the Hope, Norton, St. Mathew Hall, and Navarin Basins was in the early 1980's. The leasing plans caused significant controversy and even litigation. We do not want to see that repeated. We opposed those activities then, and our position has not changed in the intervening decades. The risks of oil and gas activities to our well-being, way of life and environment are not outweighed by benefits that companies might obtain or offer to us.

We believe that none of the planning basins will ever meet national energy needs but, rather, will put at risk very important global marine resources including fish, marine seabirds and mammals that inhabit the northern Bering Sea, and which are vital for high latitude ocean productivity.

We urge you not to schedule lease sales in our region.

Incorporation of indigenous knowledge into BOEM's decision making.

Indigenous knowledge provides comparative, complimentary, and supplemental⁹ information that leads to better decision making. A crucial step toward a goal to discover all relevant facts will require BOEM to make meaningful efforts to reach out to communities. At a minimum should involve the following: 1. Initiate formal tribal consultation with all tribes that may be impacted. 2. Initiate public meetings in the affected areas; 3. Attend local meetings of tribes or municipalities to better understand local issues; 4. Develop a method to assess the effectiveness of tribal and community outreach.

Kawerak's Definition of Traditional Knowledge

“Traditional Knowledge (TK) is a living body of knowledge which pertains to explaining and understanding the universe, and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long-term sociocultural, spiritual and environmental engagement. TK is an integral part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and non-human phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples' identity,

⁹ J. Raymond-Yakoubian. 2016. Conceptual and institutional frameworks for protected areas and the status of indigenous involvement: Considerations for the Bering Strait Region of Alaska. In T. Herrmann and T. Martin (Eds.), *Indigenous Peoples' Governance of Land and Protected Territories in the Circumpolar Arctic*. Springer: Switzerland. Pp:83-103.

*cosmology, values, and way of life. Tradition – and TK – does not preclude change, nor does it equal only 'the past'; in fact, it inherently entails change.*¹⁰

Conclusion

Kawerak is opposed to oil and gas lease sales in the Hope, Norton, St. Mathew Hall, and Navarin Basins and encourages the incorporation of indigenous knowledge into BOEM's decision making.

If you have questions please feel free to contact Austin Ahmasuk, Marine Advocate at (907) 443-4368 or e-mail marine.advocate@kawerak.org. Thank you for your time and consideration.

Sincerely,
KAWERAK, INC.

Mary David, Exec. V.P. for

Melanie Bahnke, President

¹⁰ Raymond-Yakoubian, Julie, Brenden Raymond-Yakoubian and Catherine Moncrief. 2017. The incorporation of traditional knowledge into Alaska federal fisheries management. *Marine Policy* 78: 132-142.