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September 14, 2023

RADM Megan Dean
Commander, 17th Coast Guard District
U.S. Coast Guard
709 W. 9th St.
Juneau, AK 99802

RADM Dean:

Thank you for your continued work on the Port Access Route Study (PARS) for the Alaskan Arctic Coast under development by District 17 of the U.S. Coast Guard. The undersigned groups engage in issues related to marine conservation policy in the Arctic, including increasing vessel traffic in the Bering, Chukchi and Beaufort Seas.¹

Because increasing vessel traffic brings new and compounding risks that could significantly affect people and wildlife in the region, the Coast Guard should expedite completion of the Alaskan Arctic Coast PARS. We urge the USCG to publish and seek public comment on draft recommended routing measures for the Alaskan Arctic Coast PARS area as quickly as possible. After the public comment period and continued meaningful engagement and consultation with Tribes and Alaska Native Organizations and other interested groups, we urge the Coast Guard to publish final recommended routing measures and to seek approval of

¹ While this comment letter focuses primarily on the Alaskan Arctic Coast PARS study area, it occasionally references adjacent regions covered by the PARS for the Chukchi Sea, Bering Strait and Bering Sea. *See* U.S. Coast Guard, Preliminary Findings, Port Access Route Study: In the Chukchi Sea, Bering Strait and Bering Sea (December 2016), available at <https://www.navcen.uscg.gov/?pageName=PARSReports>. We encourage the Coast Guard to consider new or revised management measures for the southern Chukchi Sea, Bering Strait and Bering Sea areas when such measures would improve maritime safety, opportunities for subsistence hunting and protections to living marine resources.

those measures at the International Maritime Organization (IMO). To avoid additional delay, the Coast Guard should submit proposed routing measures to the IMO's Navigation, Communications, Search and Rescue (NCSR) subcommittee in advance of the subcommittee's June 2024 meeting.

The Arctic PARS study area has tremendous ecological significance and is vital for the food security and subsistence way of life practiced by Tribes in the region for millennia. The region is undergoing significant, rapid changes—including warming, diminishing seasonal sea ice and increasing vessel traffic. In light of these changes, the Coast Guard should approach the completion of the Arctic PARS process with a greater sense of urgency. While repercussions caused by the COVID-19 pandemic resulted in unforeseen delays, the continued escalation in Arctic mining interests and associated international maritime logistics (for example) increases the need for protective measures. Swift completion of an integrated system of routing and other vessel traffic management measures that will enhance navigational safety, reduce user conflicts and protect and preserve ecosystem health is of utmost importance in protecting Arctic Tribes, communities, and the environment. A 2021 comment letter, signed by many of our organizations and included as an attachment, contains more detailed recommendations related to this PARS process.

Even after the Coast Guard completes the PARS process, it will take significant time for the IMO to consider and approve proposed routing measures. Submission of proposed routing measures to the NCSR subcommittee of the IMO can only be made once a year. The next NCSR meeting will take place in June of 2024, and submissions to the subcommittee for consideration must occur 13 weeks in advance. If approved by NCSR, routing measures will be sent to the Marine Safety Committee (MSC) for adoption. The next relevant MSC will not meet until December of 2024. If the Coast Guard is unable to submit proposed routing measures to NCSR in time for the 2024 meeting, this schedule would likely be pushed back by a year, with MSC adoption not taking place until late 2025 at the earliest. To avoid additional delay, we urge the Coast Guard to finish the Alaskan Arctic Coast PARS and submit its recommendations to NCSR in 2024.

As the Coast Guard develops the Alaskan Arctic Coast PARS, it should continue to seek out and incorporate Indigenous Knowledge, continue to seek input and recommendations from Indigenous residents and Alaska Native Organizations (ANOs);² and continue to engage in consultation with affected federally recognized Tribes and Alaska Native corporations. Alaska Native peoples are the original and continued mariners of the Bering, Chukchi and Beaufort Sea and have lived on these coasts for millennia. As the Coast Guard develops recommendations for the Alaskan Arctic Coast PARS, it should give great weight to the knowledge, concerns and recommendations it receives from Alaska Native Tribes and the ANOs that represent them.

Thank you again for your work on the Alaskan Arctic Coast PARS. Our organizations appreciate the Coast Guard's commitment to proactive management of U.S. Arctic waters, from the Aleutian Islands to

² In this comment letter, we use the term "Alaska Native Organizations" to mean groups that represent the interests of Alaska Native people who live in the study area for the Alaskan Arctic Coast PARS or who may otherwise be affected by the PARS process.

the Bering Strait, and now for the Chukchi and Beaufort seas. We look forward to the eventual adoption and implementation of a system of vessel traffic management measures that reduces risk among waterway users, enhances vessel safety, and fosters continued well-being for Tribes and communities by strengthening protection of the marine environment.

Sincerely,



Melanie Bahnke
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