THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-8690
Fax: 907-269-5673

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Aldine Reynolds
Bureau of Ocean Energy Management, Alaska Region
Office of Leasing and Plans
3801 Centerpoint Dr., Ste. 500
Anchorage, AK 99503

Submitted via regulations.gov portal

Re: State of Alaska Comments on BOEM Request for Information and Interest — Commercial Leasing for Outer Continental Shelf Minerals Offshore Alaska (Docket No. BOEM-2025-0318)

Dear Ms. Reynolds:

The State of Alaska (State), Department of Natural Resources (DNR), in coordination with the Alaska Departments of Environmental Conservation (ADEC), and Fish and Game (ADF&G), submits the following comments in response to the Bureau of Ocean Energy Management's (BOEM) Request for Information and Interest (RFI) regarding a potential Alaska Outer Continental Shelf (OCS) minerals lease sale. These comments incorporate technical input from the Alaska Division of Geological & Geophysical Surveys (DGGS) and the Division of Mining, Land & Water (DMLW).

The State notes that BOEM is the sole federal agency authorized under the Outer Continental Shelf Lands Act[1] (OCSLA) to manage and issue competitive leases for non-oil and gas minerals on the OCS, including strategic and critical marine minerals, in accordance with its regulations at 30 C.F.R. Parts 580–582. BOEM's authority includes evaluating areas for potential commercial leasing, conducting environmental review under applicable federal law, and holding competitive lease sales in response to industry interest and data indicating resource potential. BOEM's Marine Minerals Program implemented Executive Order 13817[2] ("A Federal Strategy to Ensure Secure and Reliable Supplies of Critical Minerals") and Secretarial Order 3359[3] ("Critical Mineral Independence and Security"), which direct enhanced federal collaboration to inventory and identify new marine mineral resources and support responsible development of critical mineral supplies for national economic and security needs.

The State understands that the RFI represents an initial step in a comprehensive multi-stage process that could, at later steps, include area identification, proposed leasing notices, competitive lease sales, and, ultimately, plan approvals for exploration and development. As described in BOEM's Marine Minerals Program guidance, this early outreach is intended to gauge industry

[1]43 U.S.C. Sec. 1337 (k)(1)
[2]Federal Register, A Federal Strategy To Ensure Secure and Reliable Supplies of Critical Minerals, https://www.federalregister.gov/documents/2017/12/26/2017-27899/a-federal-strategy-to-ensure-secure-and-reliable-supplies-of-critical-minerals
[3]DOI, Order No. 3359, Critical Mineral Independence and Security https://www.doi.gov/sites/doi.gov/files/uploads/so_criticalminerals.pdf

interest and gather information about resource potential, data gaps, and stakeholder concerns. Any subsequent leasing decision would be subject to further federal review and approval, including environmental analysis under the National Environmental Policy Act (NEPA) and compliance with all other applicable federal and state laws and consultation requirements prior to final determination. This process ensures that environmental impacts, multiple uses of the OCS, cultural and socioeconomic considerations, and other public interest factors are fully evaluated before any lease sale or related permitting occurs.

By conducting detailed impact analysis at stages where activities are defined with greater specificity, the NEPA process ensures that environmental protection measures can be reasonably tailored to the scale, timing, and location of proposed specific actions. The State also believes that the NEPA process and requirements can be completed efficiently and quickly consistent with EO 13817 and that the federal government should continue to focus on improving this process. These assessments are important in Alaska, where environmental conditions, subsistence uses, and ecological sensitivity can vary significantly across regions and seasons. Alaska agencies possess extensive technical expertise regulating mineral exploration, development, production, transportation, spill response, and environmental protection in some of the most unique operating conditions in the world. Early and continuous consultation with the State and with Alaska's coastal and indigenous communities improves decision-making, strengthens environmental protections, and ensures federal actions reflect regional conditions and realities.

The State appreciates BOEM's early engagement and offers the following information regarding geological data gaps, scientific uncertainty, geologic hazards, and boundary/jurisdictional considerations that warrant careful review prior to any leasing decisions.

1. Geological Data Gaps and Scientific Uncertainty

Current understanding of offshore geologic resources in the RFI areas remains limited.

Geologic knowledge of surface materials in both onshore and adjacent offshore coastal areas is incomplete. While the Nome area has been studied relatively extensively, regions such as Goodnews Bay and portions of the Aleutian Arc lack detailed geologic mapping. Additional high-resolution geologic mapping could substantially improve understanding of mineral potential, sediment characteristics, and associated geohazards.

Improved characterization of river systems discharging into the Bering Sea and Gulf of Alaska is needed. Specifically, better quantification of sediment supply rates, sediment transport pathways, and material types are required. Although work has been conducted in the Nome and Goodnews Bay regions, comparable datasets are lacking elsewhere. These data are critical for understanding seabed composition, sediment dynamics, and potential resource distribution.

USGS Professional Paper 1870[4] provides a succinct summary of Alaska's geologic and metallogenic setting and documents marine mineral occurrences. The report also acknowledges

[4] USGS, Marine Minerals in Alaska – A Review of Coastal and Deep-Ocean Regions, Professional Paper 1870, https://pubs.usgs.gov/publication/pp1870

sparse sampling in deep-ocean areas, which limits assessment of marine mineral deposits in Alaskan waters. Tens of thousands of marine geologic samples, including hundreds of marine mineral samples, were reviewed, yet data gaps remain extensive in the deep-ocean regions. The report highlights the need for additional ship-based geophysics, subseafloor structural mapping, geochemical sampling, and integration with available environmental datasets to refine prospective regions and better understand mineral distribution and associated ecosystems.

Given these uncertainties, the State recommends BOEM consider additional baseline geologic, geophysical, and environmental investigations prior to delineating specific lease areas.

2. Geologic Hazard Considerations

The RFI areas include regions subject to significant seismic, tsunami, coastal, and volcanic hazards. These hazards have direct implications for offshore mineral exploration, infrastructure design, environmental protection, and worker safety.

Seismic and Tsunami Hazards

The Aleutian Arc[5] is highly tectonically active, formed by subduction of the Pacific Plate beneath the North American Plate at convergence rates of approximately 50–80 mm/year, generating thousands of earthquakes annually. In addition to the Alaska-Aleutian megathrust, numerous splay thrust, strike-slip, and normal faults can produce significant earthquakes independent of megathrust rupture. Steep submarine slopes, canyons, volcanic edifice collapse, and strong earthquake shaking present credible tsunami-generating mechanisms throughout the Arc.

The Gulf of Alaska Seamounts are located at the eastern end of the Alaska-Aleutian megathrust where tectonic plate convergence transitions to a distributed network of thrust faults in the Pamplona fault zone. The region is similarly seismically active, is home to the second-largest earthquake ever recorded (Mw 9.2), and remains capable of generating trans-Pacific and local, landslide-generated tsunamis.

Goodnews Bay and Norton Sound are less seismically active than the Alaska-Aleutian megathrust and are somewhat protected from tsunamis generated by the subduction zone, but may still experience local tsunami events caused by submarine/subaerial landslide (generated by volcanic flank collapses along the northern Alaska Peninsula or collapse of the Bering Sea shelf) with or without an accompanying earthquake. The Seward Peninsula also has a 50% probability of producing a slightly damaging earthquake within the next 100 years. Submarine slope failure of the Yukon River Delta could generate a landslide-generated tsunami event in Norton Sound.

Coastal and Storm Hazards

Bering Sea storms historically produce storm surge, high winds, wave action, coastal flooding, and erosion along the Aleutian Arc, Goodnews Bay, and Norton Sound coastlines. Decreasing sea ice and longer open-water periods increase fetch and may exacerbate storm intensity and duration.

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[5] Coombs, M.L., White, S.M., and Scholl, D.W., 2007, Massive edifice failure at Aleutian arc volcanoes: Earth and Planetary Science Letters, v. 256, p. 403-418, doi: 10.1016/j.epsl.2007.01.030.

Recent extratropical typhoons (Merbok 2022, Ampil 2024, Halong 2025) highlight the vulnerability of Alaska Native communities to extreme weather.

The relatively shallow nearshore bathymetry of Norton Sound and Goodnews Bay makes these areas particularly susceptible to dynamic sediment transport and frequent changes in seabed morphology across nearshore and continental shelf environments. These systems are already experiencing relatively rapid shoreline change, driven in part by increasingly intense and prolonged storm activity. Activities that alter the seabed or shoreline, such as dredging or construction of coastal protection structure, may disrupt natural sediment transport processes, potentially accelerating erosion, shifting sediment pathways, and causing unintended shoreline change in adjacent areas.

Volcanic Hazards
The Aleutian Islands RFI area may pose volcanic hazards to offshore mining activities, dependent on eruptive activity and distance from the volcanism. The principal hazard associated with explosive eruptions at Alaska volcanoes is the generation of volcanic ash clouds, which are blasted high into the atmosphere and then carried by the wind. Ash-rich clouds are a hazard to aviation. Heavy ashfall may cause difficulties for human infrastructure on the ground, including human health concerns, interference with power generation and electrical equipment, damage to air filters and gasoline engines, and interruption of radio and cell phone transmissions, and greatly reduced visibility.

Coombs and others (2007)[6] also detail edifice failure and submarine-debris-avalanche deposition at Aleutian arc volcanoes. These edifice failures are attributed to both syneruptive collapse as well as deep-seated failures not associated with eruptive deposits.

3. Offshore Boundary and Jurisdictional Considerations

DMLW notes the following issues regarding federal/state boundaries:

Three-Mile Limit
BOEM holds delegated authority to establish the geographical three-mile limit along the Alaska coast. In certain areas, this limit has not yet been formally established. The State requests that no leasing occur within these townships until the geographical three-mile limit has been clearly delineated on BOEM's website and GIS datasets.

Submerged Lands Act (SLA) Boundary
In some locations, proposed OCS leasing areas extend across the boundary between federal and State-owned tide and submerged lands. This overlap appears to result from incomplete BOEM Offshore Boundary datasets. Prior to leasing any affected areas, BOEM should complete and publish the Offshore Boundary Line for the SLA to avoid jurisdictional conflicts and ensure clarity for project planning.

[6] Coombs, M.L., White, S.M., and Scholl, D.W., 2007, Massive edifice failure at Aleutian arc volcanoes: Earth and Planetary Science Letters, v. 256, p. 403-418, doi: 10.1016/j.epsl.2007.01.030.

4. Recommendations

Based on the above, the State recommends that BOEM:

1. Prioritize updated geologic, geophysical, and environmental data acquisition before advancing lease area identification.
2. Incorporate detailed seismic, tsunami, landslide, storm surge, and volcanic hazard assessments into early planning.
3. Evaluate cumulative impacts to coastal geomorphology, sediment transport, and shoreline stability.
4. Ensure clear delineation of the geographical three-mile limit and SLA boundaries before considering any leasing.
5. Continue close coordination with State agencies, Alaska Native communities, scientific institutions, and relevant industry to ensure decisions are based on the best available science.

The State appreciates BOEM's commitment to early stakeholder engagement and looks forward to continued coordination as this process advances.

Sincerely,

Ashlee Adoko
Executive Director, Office of Project Management and Permitting (OPMP)

ecc: John Crowther, Commissioner-designee, DNR
Brent Goodrum, Deputy Commissioner, DNR
Randy Bates, Commissioner, ADEC
Crystal Koeneman, Deputy Commissioner, ADEC
Douglas Vincent-Lang, Commissioner, ADF&G
Benjamin Mulligan, Deputy Commissioner, ADF&G
Ashlee Adoko, Executive Director, OPMP
Erin Campbell, Director, DGGS
Christy Colles, Director, DMLW
Derek Nottingham, Director, DOG
Gene McCabe, Director, ADEC
Sarah Meitl, SHPO/OHA