



**EPA Region 10 Tribal Operations Committee (RTOC)
P.O. Box 689
Spokane, Washington 99210
www.region10rtoc.net**

March 31, 2023

Ambassador David Balton, Executive Director
Arctic Executive Steering Committee
Office of Science and Technology Policy
Executive Office of the President
1600 Pennsylvania Ave NW
Washington, D.C. 20500

SENT VIA EMAIL (David.A.Balton@ostp.eop.gov)

RE: National Strategy for the Arctic Region Implementation Plan

Dear Ambassador Balton:

This letter is sent on behalf of the Tribal Caucus of the Region 10 Tribal Operations Committee's ("RTOC") on the proposed implementation plan for the National Strategy for the Arctic Region. These comments are not sent on behalf of EPA Region 10 or any employees of EPA, but solely on behalf of the tribal government representatives of the RTOC.

The RTOC strongly supports the development of the National Strategy for the Arctic Region and the commitment of the Biden Administration in re-establishing the Arctic Executive Steering Committee. We appreciate the invitation to provide feedback on the development of the implementation plan for the National Strategy.

The RTOC requests that the implementation plan clearly establishes requirements for meaningful tribal consultation prior to making significant decisions in implementation. Consultation should occur prior to the finalization of a federal decision to allow for consideration of Tribal concerns and expertise. Any decisions impacting Tribal lands, rights, or resources must have Free, Prior and Informed Consent. This means that Tribe must be afforded the opportunity to give or withhold their consent for any action that would affect their lands, territories, or rights.

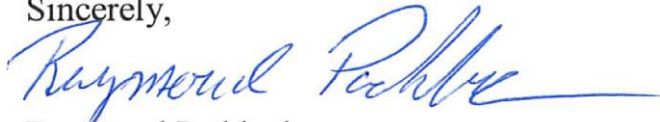
The RTOC also requests that the implementation plan not overly rely on battery technology and critical mineral mines to address climate impacts. Mining can adversely affect natural and

cultural resources that are of great significance to Tribes. The recent example of the BLM's Thacker Pass Lithium Mine in Nevada is a good example of how critical mineral mining can collide with protection of Tribal resources.

Other clean energy options, such as land-based wind, solar, conservation, as well as alternative battery solutions, should be explored prior to committing to landscape altering mining projects that threaten Tribal resources.

The RTOC appreciated your consideration of these comments and the potential of the implementation of the National Strategy to positively and meaningfully impact Alaskan Tribes.

Sincerely,



Raymond Paddock

Region 10 RTOC, Tribal Caucus Co-chair