Citizens' Advisory Commission on Federal Areas





101 Airport Road Palmer, AK 99645 Phone: 907.269.3645 dnr.cacfa@alaska.gov

August 4, 2016

Neil Kornze, Director BLM Washington Office 1849 C Street NW, Rm. 5665 Washington DC 20240 director@blm.gov

Re: Public Protest Period for the Eastern Interior Proposed Resource Management Plan and Final Environmental Impact Statement

Director Kornze:

The Citizens' Advisory Commission on Federal Areas in Alaska (CACFA; Commission) would like to request a 90-day extension to the public protest period, established in regulation at 43 CFR 1610.5-2(a)(1), for the Eastern Interior Proposed Resource Management Plan and Final Environmental Impact Statement (EIRMP).

The release of the 4-volume EIRMP last week coincides with one of the busiest times of year for many Alaskans most affected by the proposals and analyses. The availability of a 30-day protest period is virtually meaningless under the circumstances.

These summer months are a critical time for everything from tourism to mining to construction and maintenance to subsistence harvests. A great deal of this activity takes place in the field, often significant distances from Bureau field offices, post offices, and high speed Internet access. Many Alaskans may not even be aware of the EIRMP release, let alone have time to access, download or procure a copy, break away and review 103 maps and 1800 pages of complex and comprehensive proposals, compare multiple existing plans, seriously consider and prepare a substantive protest and submit it through the mail to Washington DC within a 30-day period.

In considering this extension request, the Commission asks you to reflect on your trips to Interior Alaska since your appointment, the people you met, the communities you visited and the conditions you saw and experienced directly. Imagine those Alaskans taking invaluable time out of the limited window many have to procure their livelihood and feed their families, relocating to an accessible area with Internet access and a post office, and reviewing this lengthy and detailed document or else lose their guaranteed right to protest its multi-decadal effect on their interests.

The Commission believes a 90-day extension is the minimum amount of time necessary to make the protest period a meaningful one to those affected by the plan. As noted in the EIRMP, the plan will be broken into four separate plans with four Records of Decision. A 90-day extension would allow for 30 days of review for each of those four proposed plans. Further, it would ameliorate the incredibly poor timing of the plan's release during the busy summer months. The EIRMP has been nine years in the making, and the Bureau has had years to develop and review the 18-pound document we have been handed. This extra review time for the public is the only fair and equitable bookend for this lengthy and contentious planning process.

Thank you for your timely consideration of this request.

Yours faithfully,

Sara Taylor Executive Director

 cc: The Honorable Lisa Murkowski, U.S. Senate The Honorable Dan Sullivan, U.S. Senate The Honorable Don Young, U.S. House of Representatives Bud Cribley, Alaska State Director, Bureau of Land Management Andrew T. Mack, Commissioner, Alaska Department of Natural Resources Samantha Carroll, Statewide BLM Coordinator, Alaska Department of Natural Resources Sue Magee, Statewide ANILCA Coordinator, State of Alaska