



KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Diomedes

Inaliq

Elim

Niviarcaurluq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Qawiaruq

Nome Eskimo

Sitnasuak Inuit

Savoonga

Sivunguq

Shaktolik

Saktuliq

Shishmaref

Qikiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Uᅇalaqᅇiq

Wales

Kiᅇigin

White Mountain

Iᅇaᅇuik /

Nutchirviq

April 12, 2019

BLM Anchorage Field Office
Attn: BSWI RMP
4700 BLM Road
Anchorage, AK 99507

**RE: Bureau of Land Management (BLM), Bering Sea –Western Interior,
Resource Management Plan (RMP) and Environmental Impact Statement
(EIS)
REQUEST for 120 Day Comment Period**

To Whom It May Concern:

Kawerak is the regional tribal consortium working with 20 tribes in the Bering Strait region with the main office in Nome. In regards to the above referenced RMP and EIS, Kawerak joins the following federally recognized tribes (signed on to this letter) in formally asserting an extension of the comment period which currently ends June 13, 2019 should now end in **120 days with a proposed new deadline of July 13, 2019**. The RMP Volumes 1-3 comprise 1,504 pages, plus 24 fact or summary sheets that amount to slightly over 101MB. The RMP reports which provide additional background comprise 2,159 pages that amount to 173 MB for a total digital volume of 274MB or 3,687 pages. Because of the enormity of the material the 90 day comment period does not provide adequate time to review the materials. **Kawerak's immediate and urgent recommendation is to extend the comment period to include an additional 30 days which would result in a new deadline to end July 13, 2019.**

Justification for 120 day Public Notice Requirement and Public Comment Period:

The RMP is complex, Volume 1: Executive Summary, Chapters 1 – 3, Appendices A – L, alone indicates a *Flesch Reading Level* of 18.7 and *Flesch Kincaid Grade Level* of 15.1. The *Flesch* indices indicates the material is “very confusing” and is best understood by people with at least a college education. The complexity of the material requires input from diverse scholars on the various subjects posed within the RMP and most importantly additional traditional knowledge commentary which is not presented in the RMP.

It is our understanding BLM has run out of paper copies of the BLM RMP and will require the public to download the materials from the BLM website. Village internet connectivity is limited and because of the size of the material downloads of the RMP sections may stall village computers and cause frustration which might lead to complacency in commenting.

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.

“Balancing habitat conservation and responsible development of public land resources ensures the best outcome for the people and wildlife that rely on these lands.”¹

Brian Steed, Deputy Director for Policy & Programs Bureau of Land Management

CONCLUSION

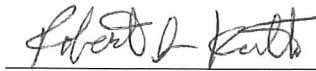
Kawerak is very concerned about the social implications of the BLM RMP to communities that are within the RMP and communities that are near the RMP and depend on those lands for subsistence. Given the size of the report, its many components, and the serious concerns we intend to bring forth about the contents of the RMP, a 90-day comment period puts too much burden on the public. Please consider our request for time extension for a **120 day** public comment period.

Thank you for your time and consideration.

Sincerely,
KAWERAK, INC.



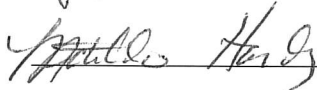
Melanie Bahnke, President/CEO



Robert Keith, President - Native Village of Elim



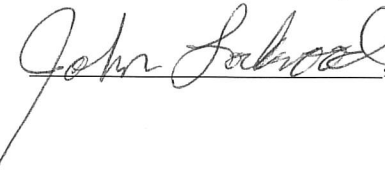
Archie Ervin, Vice President - Native Village of Koyuk



Matilda Hardy, Council Member - Native Village of Shaktoolik



Kawerak Board Chairman Frank Katchatag – President Native Village of Unalakleet



John Lockwood, Council Member - Native Village of St. Michael

CC: Honorable Lisa Murkowski
Honorable Dan Sullivan
Honorable Don Yong
Brian Steed, Deputy Director BLM
Jorjena Barringer, BLM Project Manager

¹ Statement of Brian Steed Deputy Director for Policy & Programs Bureau of Land Management U.S. Department of the Interior House Committee on Natural Resources Subcommittee on National Parks, Forests, and Public Lands Hearing on The 2020 President's Budget Request April 10, 2019

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