



To: Director, Randall Luthi  
Alaska Region Director, John Goll  
Minerals Management Service

May 7, 2008

Cc: Senator Ted Stevens, Senator Lisa Murkowski, Representative Don Young, Governor Sarah Palin, Alaska State Senator Lyman Hoffman, Alaska State Representative Bryce Edgmon

**Re: *Request for extension in scoping period for North Aleutian Basin Sale 214 and associated public scoping meetings***

On behalf of our board of directors and members across Alaska- who include coastal community residents, fishermen, and other marine resource users throughout Bristol Bay and the Bering Sea- we respectfully request your consideration of an extension of the scoping period for proposed Sale 214.

The timing of the scoping comment period- while allowing 90 days for comment- coincides with the busiest time of the year for coastal and rural communities in southwest Alaska and the Bristol Bay region. Halibut and herring fisheries in the Bristol Bay region will be getting under way in the coming weeks. Preparations for salmon fishing throughout western Alaska also begins in the early spring, with the start of the salmon fishing season in early June and running through July for red salmon and through September for silver salmon. Harvest of other fish species, hunting, and gathering of wild foods keeps the majority of rural Alaskan residents occupied throughout the summer into early fall.

The currently scheduled deadline for scoping comments on the North Aleutian Basin lease sale of July 7<sup>i</sup> notably occurs at the heart of the Bristol Bay salmon fishing season and will preclude a number of potentially affected members of the public- especially fishermen- from commenting. This timing shows a misunderstanding or lack of concern for the way of life in the region that continues to support the largest salmon fishery and runs of wild salmon in the world. The timing is also highly inopportune for Villages and Tribes to submit comments, as most members will be out hunting and fishing during summer months and meetings will not resume until the fall. An extension of the scoping period is necessary to provide these residents and entities full opportunity to participate in the NEPA process and to ensure an adequate response from potentially affected communities.

We also recently became aware through email communication with Robin Cacy at the Minerals Management Service (MMS) Alaska Region office that public scoping meetings on North Aleutian Basin Sale 214 are scheduled just days from now in Anchorage on May 13<sup>th</sup> and Dutch Harbor on May 15<sup>th</sup>. We are still unaware at this time of any meetings scheduled in potentially affected communities on the Alaska Peninsula or in Bristol Bay. Less than a week is an extremely short window of notice which does not provide the public with adequate notice needed to prepare comments on this very important subject. This is of great concern as the same disregard for adequate notice for public meetings occurred during public hearings held by MMS on the 5-Year OCS leasing program<sup>ii</sup>.

MMS has made repeated statements about a commitment to a slow and thorough process for the proposed North Aleutian Basin sale that is not rushed and allows plenty of time for public input

and scientific study. However, at the very outset of the NEPA process for Sale 214, we again encounter a hasty process which is not considerate of vital fishing and subsistence harvesting activities in the communities surrounding the proposed sale area. **If MMS is proposing to lease an area that lies among the most important fishing grounds in the nation- it simply must do a much better job at allowing for input by the fishing industry, subsistence harvesters, residents of fishing communities, and others that wish to participate in the process.**

**We request that MMS extend the deadline for scoping comments on the North Aleutian Basin Lease Sale 214** until late fall to allow commercial and subsistence fishermen, the sport fishing industry, coastal community residents, Villages, Tribal entities, and others who are seasonally unavailable throughout late spring and summer months- and who have the potential to be greatly affected by the proposed lease sale- adequate time to provide comments. It is absolutely critical that these individuals are provided with every opportunity to participate at all steps of the NEPA process for the proposed sale.

**We also request that MMS postpone public scoping meetings until the late fall for the reasons cited above.** A week's notice is simply not adequate to provide an opportunity for the public to meaningfully participate. In the future, we hope that MMS will provide at least several weeks notice for public meetings or hearings that it holds.

Additionally, **we request that MMS hold scoping meetings for Sale 214 in other potentially affected communities** in the Bristol Bay region, in the Yukon-Kuskokwim area, and in the Alaska Peninsula region. We also request that a hearing be held in the Pacific Northwest, most logically in Seattle, due to the extreme economic importance of Bristol Bay and Bering Sea fisheries to local and state economies in the region and to allow fishermen who reside in the area and fish in Bristol Bay and the Bering Sea to participate in meetings. Due to the incredible ecological, cultural, and social value of public trust resources in the southeast Bering Sea region including five National Wildlife Refuges, a scoping meeting- and subsequent public meetings related to the NEPA process for Sale 214- should be held in our nation's capitol, Washington D.C.

Because of the extreme importance of the living marine resources in Bristol Bay and the southeast Bering Sea region in which MMS is proposing a lease sale, it is critical that the agency strives in every possible manner to provide for a well-planned and transparent pre-lease process that allows adequate opportunity for public input at every step of the process. In order to do this, the timing must be considerate of, and work around, fishing and subsistence activities that are the lifeblood of the potentially affected communities.

Thank you for your time and consideration.

Sincerely,

Kelly Harrell  
*Friends of Bristol Bay* Coordinator  
Alaska Marine Conservation Council

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<sup>i</sup> See Federal Register notice at: <http://www.mms.gov/federalregister/PDFs/CallandNOIforNAB214.pdf>

<sup>ii</sup> See Federal Register notice on 5-Year OCS Program hearings at: <http://www.epa.gov/EPA-IMPACT/2006/September/Day-26/i8267.htm> . Notice was published for the hearings in the Federal Register the day after a hearing occurred in Unalaska, the day of the hearing in Cold Bay, and just days before other hearings in potentially affected communities.