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August 22, 2018

Ferris Couture, Project Lead  
Alaska State Office  
Bureau of Land Management (BLM)  
222 West Seventh Avenue – Mailstop 13  
Anchorage, Alaska 99513  
blm\_ak\_Willow\_comments@blm.gov  
fcouture@blm.gov

*Sent via email*

**Re: Request for Extension of Willow Scoping Comment Period**

Dear Ms. Couture:

On behalf of the Native Village of Nuiqsut (NVN), a Bureau of Indian Affairs federally-recognized tribe, we request additional time to provide scoping comments on the Environmental Impact Statement (EIS) for the proposed Willow Master Development Plan (MDP).

Currently, NVN is inundated with development proposals and planning processes. The Nanushuk NEPA process is currently underway, and the Bureau of Land Management's (BLM) regional mitigation strategy for the northeastern NPR-A has yet to be finalized. Moreover, BLM has not even issued its Final Supplemental Environmental Impact Statement (SEIS) for GMT-2 or made a decision on that project, which will connect directly to Willow. NVN strives to be an active and engaged entity in these review processes, but the amount of planning currently underway in the region presents serious capacity challenges in our ability to have constructive and meaningful involvement.

Notice for this comment opportunity was issued on August 7, 2016, with the comment period closing September 6, 2016. This provides only a 30-day comment period during the summer months, when many of our tribal members are engaging in subsistence activities and are unavailable to comment. This massive development proposal requires a significantly longer comment period so that our members can participate in an informed manner.

We are already experiencing negative impacts from existing development in the region and are feeling the effects from infrastructure and development activities circling our community. This

project will involve an entirely new central processing facility, an airstrip, a gravel mine, and offshore barging activity. The additional aircraft traffic, and offshore barging alone are potentially significant to our community's subsistence hunting and whaling practices, in addition to the pipelines, pads and roads which will further encircle us. Thirty days is not an adequate amount of time for our community to consider and engage in the review of this project.

We respectfully request BLM extend this scoping comment by an additional 45 days, so that it would close on October 20, 2016 to allow our members to better understand this proposal and meaningfully engage in the process.

Respectfully,

Native Village of Nuiqsut Tribal Council

*Thaske A. DAA, Tribal Administrator*