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Bureau of Land Management
Coastal Plain Oil And Gas Leasing Progra
222 West 7th Avenue, Stop #13
Anchorage AK 99513-7504

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January 24, 2019

Via U.S. First Class Mail and Electronic Mail

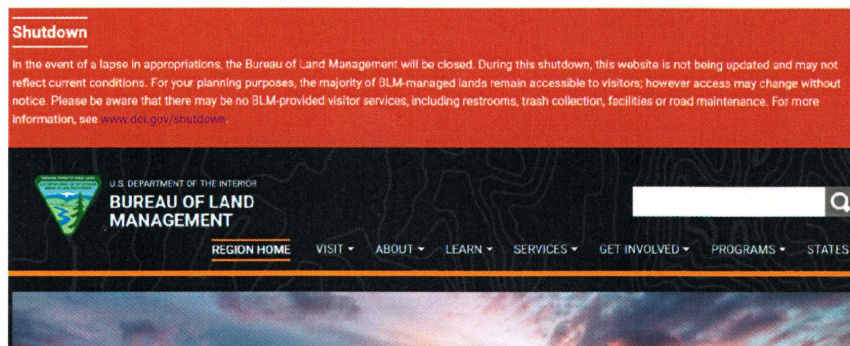
Bureau of Land Management
Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513-7504

RE: Request for Extension of the Comment Period for the Coastal Plain Oil and Gas Leasing Draft Environmental Impact Statement

To Whom It May Concern:

This firm represents Patagonia Works, a certified B-corporation incorporated in the State of California. Patagonia Works has a rich history of environmental activism and an interest in the preservation of areas within the Arctic National Wildlife Refuge impacted by the proposed leases, as well as the broader environment that would be impacted by leasing activities. Due to the ongoing federal government shutdown, Patagonia Works requests that the comment period for the Draft Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement ("Draft EIS") be extended for forty-three (43) days from the final day of the government shutdown. The Draft EIS was originally made available by the Bureau of Land Management ("BLM") Alaska State Office, Anchorage, Alaska on December 20, 2018, a mere two days prior to the lapse of appropriations and subsequent cessation of non-essential federal government functions. As such, nearly the entire length of the comment period has been compromised by the shutdown. This has resulted in an inadequate opportunity for public comment and participation.

To illustrate the concern, we offer this screenshot of the message which has been displayed at the top of the BLM's webpage during the entirety of the shutdown:



The public's primary resource for staying abreast of the Draft EIS, and any potential associated action, is the BLM's webpage. Without access to an up-to-date resource, public commenters are left in an unguided limbo. A sufficient comment period requires civilians to be aware of current conditions.

Alternatively, attempting to contact the BLM regional office located in Anchorage, Alaska via telephone results in the following prerecorded message:

You have reached the BLM Alaska Public Information Center. Due to a lapse in funding of the federal government budget, we are currently out of the office. We are not authorized to work during this time, but will respond to your message when we return back to the office. Thank you and have a good day.

As such, there is no available method by which a member of the public may contact the BLM Alaska office directly to ask questions of personnel during the comment period.

Finally, because the length of the government shutdown has essentially coincided with the Draft EIS comment period, the BLM has been unable to host the previously scheduled public meetings in order to address comments and questions from interested citizens. These meetings are a vital part of the public comment period, as they provide a forum for discussion and an occasion for sharing input on federal land use planning.

The unavailability of the BLM website, absence of BLM Alaska office staff, and lack of public meetings has rendered the comment period inadequate and non-compliant with the National Environmental Policy Act ("NEPA"). *Contrast* 40 C.F.R. §§ 1500.02 (requiring agencies to engage the public "to the fullest extent possible"); 1506.6(c)(requiring agencies to hold public meetings in certain circumstances;); BLM NEPA Handbook (Jan. 2008) at 99 (requiring full 45 day comment period). The entire purpose of the comment period is to engage a civic dialogue with the BLM's office to ensure the public interest is heard and protected. Failure to provide a sufficient comment period fails to adequately protect the interests of the public in the Coastal Plain Oil and Gas Leasing Program.

For these reasons, I ask that the BLM extend the comment period for the Draft EIS at least forty-three (43) days from the final day of the federal government shutdown.

Best Regards,

/s/ Thomas R. Wilmoth

TRW:KGM/sm

cc: Rob Tadlock

Coastal Plain Project Manager, Nicole Hayes (mnhayes@blm.gov)