



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Citizens' Advisory Commission on Federal Areas

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February 29, 2016

### Via Email

Charles Yudson  
National Regulatory Affairs  
Bureau of Land Management  
20 M Street, S.E.  
Washington, DC 20003  
[cyudson@blm.gov](mailto:cyudson@blm.gov)

Re: Public Meeting(s) for the Proposed Rulemaking on Resource Management Planning

Mr. Yudson:

The Citizens' Advisory Commission on Federal Areas (Commission; CACFA) was created by the Alaska State Legislature in 1982 following passage of the Alaska National Interest Lands Conservation Act of 1980. The Commission is primarily responsible for monitoring, identifying and reducing potential negative impacts to Alaska and its citizens from federal land and resource management and the implementation of federal statutes, regulations, policies and land use plans.

The Commission is especially grateful to the Alaska State Office for its informative engagement with us during the development of Planning 2.0. Alaska State Director Bud Cribley, Planning 2.0 Team Member Serena Sweet and Alaska Communications Chief Lesli Ellis-Wouters have consistently been available for presentations and commissioner questions at our triannual meetings regarding the strategy, content and fine-tuning of Planning 2.0. These public and forthcoming discussions have been invaluable in understanding the process and its intent.

Relative to other states, Alaskans will be intimately and significantly impacted by any proposed changes to how resource management plans are developed. Each landscape-level resource management plan in Alaska covers tens of millions of acres in a very diverse ownership mosaic of federal, state, Native, borough, municipal and private lands. Alaska's residents are very dependent upon the resources located on the extensive federal lands within the state. These plans can and do affect their ways of life and livelihoods. They also set the framework for multiple step-down plans so their impact can last decades. The large planning areas, complex planning scenarios, and the length of each plan create many challenges for the public to fully participate in the planning process and provide meaningful comments.

On review of the proposed rulemaking released last Friday in the Federal Register, as well as the Bureau website dedicated to this effort, it is not clear whether, where or when public hearings might be held to take public testimony and comment on the proposed rulemaking. The website only notes the possibility of a public hearing, with no location noted, and an intended webinar.

The Commission is very concerned that no public hearings will be offered, or that none will be offered in a way that allows for active participation by Alaskans. The proposed rule, and the Planning 2.0 effort in general, could provide many solutions to the various challenges we face in reviewing these large and complex land use plans, but it could also create more problems. These are matters we will have to evaluate and discuss in order to provide meaningful comments on the proposed rule, and a public hearing in Alaska would be the most effective way to inform and facilitate that discussion.

For these and many other reasons, **the Commission requests at least one public hearing on the proposed rule take place in Alaska**, including the real-time capability for Alaskans to listen in and provide testimony telephonically. A webinar would not be a sufficient means of engaging those unable to attend the public hearing, as our state's infrastructure and technological capacity does not consistently support streaming video or live chat functions. This is especially true for many rural Alaskans who would have a great deal of experiences and insights to contribute regarding Bureau-managed lands in our state.

Thank you for your timely consideration of this request. If you have any questions or would like additional information, please do not hesitate to inquire.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Sara Taylor', with a long horizontal flourish extending to the right.

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  
Michael Johnson, Senior Advisor for Alaska Affairs, U.S. Department of the Interior  
Leah Baker, Acting Branch Chief, Planning and NEPA, Bureau of Land Management  
Bud Cribley, Alaska State Director, Bureau of Land Management  
Nathan Butzlaff, Federal-State Affairs, D.C. Office of the Governor of Alaska  
Mark Myers, Commissioner, Department of Natural Resources, State of Alaska  
Sue Magee, Statewide ANILCA Coordinator, State of Alaska  
Samantha Carroll, BLM Coordinator, Department of Natural Resources, State of Alaska