

Access Fund * American Rivers * American Whitewater *
Back Country Horsemen of Washington * Clark-Skamania Flyfishers*
Conservation Northwest * Evergreen Mountain Bike Alliance * Gifford Pinchot Task Force *
Mazamas * Native Fish Society * Sierra Club Washington State Chapter * The Mountaineers
* The Wilderness Society * Vancouver Audubon * Vancouver Wildlife League *
Washington Trails Association * Washington Wild * Washington Wildlife Federation *
Willapa Hills Audubon Society

January 22, 2016

Jerome E. Perez
State Director
Oregon and Washington State Office
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

**RE: Request for Extension of 30-day Comment Period for Goat Mountain Hard Rock
Prospecting Permit Applications Modified EA**

Dear Mr. Perez:

On behalf of the hundreds of thousands of Washington and Oregon members and supporters whom our organizations represent, we are writing to request a 60-day extension of the deadline for public comments on the Goat Mountain Hard Rock Prospecting Permit Applications Modified EA.

Legal notice for the modified EA was published in The Columbian on January 5, 2016, initiating a 30-day comment period set to close on February 4, 2016. While the Bureau of Land Management (BLM) made a limited attempt to notify stakeholders of the modified EA last week via postcards, the majority of stakeholders who commented on the original EA did not receive notice, including many organizations on this letter.

Pursuant to the NEPA regulations promulgated by the Council on Environmental Quality, the BLM has the authority to provide an extension. See 40 C.F.R. § 1506.10(d). Further, the CEQ's NEPA regulations provide that federal agencies are encouraged to set time limits for the NEPA process that are appropriate to individual actions. 40 C.F.R. § 1501.8. In doing so, agencies may consider, among other factors, the degree to which relevant information is known, and if not known, the time required for obtaining it and the degree to which the action is controversial. See 40 C.F.R. § 1501.8(b)(1)(vi); 40 C.F.R. § 1501.8(b)(1)(vii).

This particular proposal is uniquely controversial. First, the Forest Service lands in question were acquired with Land and Water Conservation Fund dollars for conservation and recreation purposes. The Green River valley is a very popular recreation destination for hunting, fishing, backcountry horse riding, hiking, bird watching, mountain biking, and

paddling due to its unique scenic beauty and proximity to the Mount St. Helens National Monument. Exploratory drilling would negatively impact those recreation opportunities. In addition, this proposal could detrimentally impact water quality and federally listed salmon and steelhead in the Green River. The Green River was designated a Wild Steelhead Gene Bank by Washington Department of Fish and Wildlife in 2014 as part of a statewide effort to conserve and restore wild steelhead. The Green River is also a proposed Wild and Scenic River and an important human resource, as it flows into the Cowlitz River, which provides agricultural and municipal drinking water supplies for thousands of people in downstream communities.

For the above reasons, we request that the Bureau of Land Management extend the comment period on this rule to a full 90 days from the release of the modified environmental assessment. Not only would this provide interested organizations and stakeholders more time to generate comprehensive comments, but it would also provide the Bureau of Land Management with substantial and thorough input from the public.

Thank you for your full consideration of this request. We look forward to hearing from you as soon as possible.

Respectfully,

Joe Sambataro
National Access Director/NW Regional Director
Access Fund

Thomas O'Keefe
Pacific Northwest Stewardship Director
American Whitewater

Steve Jones
President
Clark-Skamania Flyfishers

Yvonne Kraus
Executive Director
Evergreen Mountain Bike Alliance

Lee Davis
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Laurele Fulkerson
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Tom Derry
Director
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Harry Romberg
National Forest Committee Chair
Sierra Club Washington State Chapter

Kitty Craig
Washington State Deputy Director
The Wilderness Society

Chuck Cheshire
President
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Tom Uniack
Conservation Director
Washington Wild

George Exum
President
Willapa Hills Audubon Society

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers

Eric Bjorkman
President
Vancouver Audubon

Andres Ilmer
Advocacy Director
Washington Trails Association

Ronni McGlenn
President
Washington Wildlife Federation