



Citizens Against RESERVATION SHOPPING

Citizens Against Reservation Shopping
Ed Lynch, Chairman
4712 NW Franklin St.
Vancouver, WA 98663

July 18, 2014

Elizabeth Appel, Director
Office of Regulatory Affairs and Collaborative Action
Bureau of Indian Affairs
U.S. Department of the Interior
1849 C Street, NW, Mail Stop 4141-MIB
Washington, D.C. 20240

Brian Deese
Acting Director
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Re: Request for Extension of Comment Period: BIA-2013-0007, RIN 1076-AF18

Dear Ms. Appel and Mr. Deese:

Citizens Against Reservation Shopping (CARS) is writing to you to obtain a 60-day extension of the comment period for the proposed regulations to revise 25 C.F.R. Part 83 concerning tribal acknowledgement. 79 Fed. Reg. 30766 (May 29, 2014). CARS is a non-profit organization formed in 2005 to protect Clark County, Washington, from off-reservation casino development, as proposed by the Cowlitz Tribe and as could be pursued by other groups seeking federal tribal status. CARS is very concerned over the unprecedented proposal to allow previously denied groups to re-petition for federal acknowledgement under greatly relaxed standards that limit the participatory rights of third parties. We also are concerned over the proposal to rescind the enrollment verification procedures of 25 C.F.R. § 83.12(b).

In addition to the comment period on the proposed rules, CARS is opposed to the June 30 deadline for comments to OMB on the paperwork and other burdens of the proposed rule. Obviously, the Department

of the Interior has seriously underestimated the burdens on the public from this proposal, and OMB should ensure it extends its comment period as well, so it can obtain additional information.

The proposed rules are very complex and controversial. Adequate comment requires a detailed analysis of the potential impacts on both past and pending tribal acknowledgment petitions. Our Board are all volunteers, and we have one part-time paid employee. With the time you allocate for us to respond, we effectively cannot.

Thank you for your prompt consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Ed Lynch". The signature is written in dark ink and is positioned above the typed name.

Ed Lynch, Chairman
Citizens Against Reservation Shopping