

## Thomas E/ Meacham, Attorney at Law

As legal counsel for Kadiak Holdings, LLC, I request that the public comment period on this proposal be extended for thirty (30) days from November 9, 2023. The present public comment period is only 20 days long. My client, an entity that will be directly affected by the proposal, first learned about this proposal only a day ago. Apparently, no effort was made by ADEC to individually notify persons and entities that would be directly affected.

On the substantive effect of the proposal, my client asserts that the project is unlawful because will cut its real property and improvements off from its present direct access to navigable waters; As a consequence, this project will directly violate the Public Trust Doctrine. See CWC Fisheries, Inc. v. Bunker, 755 P.2d 1115 (Alaska Supreme Court 1988).

Therefore, on behalf of Kadiak Holdings, LLC, I urge that the proposed project not be approved by your agency.

Sincerely,

Thomas E. Meacham, Attorney at Law  
Alaska Bar No. 7111032