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Appendix I
Response to comments

A. Introduction

On September 29, 2006, a BLM notice was published in the Federal Register announcing the availability of the Bay Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) (Federal Register 2006a). This notice was followed on October 13, 2006 by an additional notice by the Environmental Protection Agency also announcing the availability of the Bay Draft RMP/EIS. The September 29, 2006 notice initiated the beginning of a 90-day public comment period. Comments were accepted at any point during the 90-day period and could be submitted via email, U.S. Mail, in-person, fax, or through spoken testimony. In accordance with the Alaska National Interest Land Conservation Act (ANILCA), BLM hosted eight public meetings and/or subsistence hearings to gather testimony on the Draft RMP/EIS and to answer questions. The comment period was later extended until February 5, 2007 resulting in a 130-day comment period. For a more complete description of the public involvement efforts see Chapter V.

Approximately 13,000 letters were received on the Draft RMP/EIS during the public comment period. Of these, approximately 12,800 were submitted as five different form letters.

This appendix contains three sections:
1. Content Analysis Process,
2. Summary of Comments by Topic, and
3. Responses to Individual Comments.

It is the third section, Responses to Individual Comments, which comprises the bulk of this appendix. It mostly contains the actual text or transcription of all substantive comments received during the comment period with the BLM responses to each comment. The responses include how the comments were considered and addressed in development of the alternatives, analysis of effects, and overall development of the Proposed RMP/Final EIS.

B. Content Analysis Process

A standardized content analysis process was conducted to analyze the public comments on the Draft RMP/EIS. The word “comment” is used in two ways in this appendix: each letter, email, fax, or testimony that was submitted in response to the comment period is considered a “comment,” while at the same time each one of those letters, emails, faxes, or testimonies was parsed to extract individual “comments” or specific themes or issues that could be grouped according to the categories described later in this document. Each comment was read by two members of the planning team to ensure that all substantive comments were identified and coded to the appropriate subject category.

Non-substantive and substantive comments are defined in BLM’s Land Use Planning Handbook: “Nonsubstantive comments are those that include opinions, assertions, and unsubstantiated claims. Substantive comments are those that reveal new information, missing information, or flawed analysis that would substantially change conclusions” (BLM 2005a). The BLM’s National Environmental Policy Act (NEPA) Handbook further clarifies that “[c]omments which express personal preferences or opinions on the proposal do not require a response. They are summarized whenever possible and brought to the attention of the manager responsible for preparing the EIS. Although personal preferences and opinions

may influence the final selection of the agency's preferred action, they generally will not affect the analysis" (BLM 1988b). The planning team also adhered to the Council on Environmental Quality's regulations implementing NEPA at 40 CFR 1503.4 (a) to determine which comments would be included with responses in section D of this appendix.

Once identified, each substantive comment was entered into a database to allow sorting based on topic. Comments are listed by general topic: Resources, Resource Uses, Special Designations, Social and Economic, and Process and General. They are further broken down into subcategories under these general categories as shown in Table I.1. These general topics follow the same outline as the Draft RMP/EIS, with additional categories for comments on the RMP/EIS process and general comments not falling under a particular category. These substantive comments and the responses to them comprise the bulk of this appendix. Comments are included both as verbatim either as they were submitted in letters or email, or as they were recorded at public meetings or hearings or paraphrased to capture the essence of the comment in a more condensed format.

Many of the comments expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or represented commentary regarding resource management without any direct connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the preferred alternative, did not suggest other alternatives, or did not take issue with methods used in the Draft RMP/EIS. Where these comments expressed personal preferences or opinions, but did not require a response per BLM direction (BLM 1988b), they may be summarized below under the section, Summary of Comments by Topic. Otherwise, non-substantive comments are not addressed further in this document. Examples of non-substantive comments not further addressed include:

"The purposed Pebble Mine is a threat to fish and wildlife."
"I support Alternative C."
"These resources should not be locked up."
"BLM has the responsibility to allow access to as much of its land as possible so that resources…can be developed"

Form letters were analyzed in the same manner as all other comments. Each form letter was analyzed for substantive comments and coded and entered into the database, with the number of signatures on each form letter or the number of each form letter received noted. For example, if a form letter was received from 317 individuals, the letter itself was coded once and any substantive comments noted in this appendix, but only one response was prepared for each substantive comment.

C. Summary of Comments by Topic

This section provides a narrative summary of public comments, organized consistent with organization of Chapters II, III, and IV of the Draft RMP/EIS.

Table I.1. Summary of Substantive Comments Received by Category

Subject or Resource	Number of Substantive Comments	Percent of Substantive Comments	
Resources			
General Resources Protection	16	5.0	5.0
Water	26	8.1	8.1
Fisheries	13	4.1	6.9
Other Wildlife	9	2.8	
Cultural Resources	2	0.6	3.1
Visual Resource Management	7	2.2	
Wilderness	1	0.3	
Resource Uses			
Forestry	2	0.6	0.6
Leasable Minerals	1	0.3	5.7
Locatable and Salable Minerals	12	3.8	
General Minerals	5	1.6	
General Recreation	1	0.3	4.3
Special Recreation Management Area (SRMA)	1	0.3	
Off Highway Vehicle	8	2.5	
Travel Management	3	0.9	
Recreation Opportunity Spectrum	1	0.3	
Renewable Energy	3	0.9	6.3
Lands	4	1.3	
ANCSA (d)(1) withdrawals	4	1.3	
Honor "no more" principle of ANILCA	9	2.8	
Proposed Pebble Mine	8	2.5	2.5

Subject or Resource	Number of Substantive Comments	Percent of Substantive Comments	
Special Designations			
General Special Designations	3	0.9	0.9
ACEC	12	3.8	5.6
Wild and Scenic Rivers	3	0.9	
Subsistence Only Areas	3	0.9	
Social and Economic			
Social and Economic	19	5.9	9.6
Environmental Justice	2	0.6	
Subsistence	10	3.1	
General / Other			
Process	17	5.3	13.5
Public Outreach	4	1.3	
NEPA Adequacy	22	6.9	
General	6	1.9	27.8
Maps	10	3.1	
Climate change	9	2.8	
ROPs and Stips	12	3.8	
Abandonment, Removal, & Reclamation	2	0.6	
Editorial Changes	50	15.6	
TOTAL	**320**	**100**	

1. Resources

a) Water/Hydrology

Twenty-six comments concerning water resources were received throughout the public comment period and, besides editorial changes, accounted for the highest percentage of comments by topic. The majority of comments on water resources focused on adding some additional discussion and information to the EIS pertaining to current water quality condition, groundwater, and resource protection plans resulting from revocation of ANSCA 17(d)(1) withdrawals. Many comments demonstrated concern for water resources from potential mining practices.

b) Fish and Wildlife

About 7% of the comments focused on fish and wildlife. More than half of these comments concerned fisheries. Many comments mentioned data is lacking or false information was used concerning fisheries within the DEIS. Three comments addressed the 300-foot setback, suggested within the DEIS as protection of riparian areas and stream channels from surface disturbing activities. One of these comments suggested that the 300-foot setback serve as a minimum, and BLM should address the rational for this setback in the FEIS. In general, the nine substantive wildlife comments concerned Steller's eiders or the Mulchatna caribou heard. Two comments provided information concerning the importance of Carter and Jacksmith Bays and Carter Spit as staging areas for waterfowl, geese, and shore birds as well as migrating Steller's eiders. One comment suggested that the Required Operating Procedure (ROP) to conduct breeding eider surveys prior to oil and gas development is meaningless considering eiders are not known to breed within the planning area. One comment suggested rights-of-way exclusion areas include critical habitat for Mulchatna caribou. Another comment suggested the FEIS consider the authoritative findings and habitat management requests of the Western Artic Caribou Heard Committee be included within the Bay FEIS.

c) Special Status Species

Comments on special status animals focused on spectacled and Steller's eiders. Most of the comments regarding eiders identify the importance of Carter Spit, Jacksmith Bay, and Goodnews Bay.

d) Fire Management and Ecology

One comment was received, concerning managing fire to protect lichen rich habitats for caribou.

e) Cultural and Paleontological Resources

Only two substantive comments were received on cultural resources. One comment provided information concerning the historical villages of the Carter Spit, Jacksmith Bay, and Snow Gulch and the traditional way of life. The other requested identification of historical and grave sites.

f) Visual Resource Management (VRM)

BLM received seven substantive comments on VRM. Three comments requested editorial changes, clarifications of concepts, or maps. One comment suggested VRM should be removed from the resource management plan and addressed by individual project, while another comment suggested only VRM Class I is suitable. Another comment suggested VRM buffers should not be used altogether.

g) Wilderness

One substantive comment concerning wilderness was received, urging BLM to ascertain the extent of wilderness as a resource value in the Bay planning area.

2. Resource Uses

a) Minerals

About 6% of the substantive comments received concerned minerals management. These were broken down among locatable minerals, leasable minerals, salable materials, and general mineral related comments. Twelve comments pertained to locatable and salable minerals, while one comment

concerned leasable minerals and four additional comments concerned general mineral management. Three comments expressed the importance of mineral development with respects to Alaska's economy or national security. Eight comments concerned additional mineral potential mapping not referenced in the DEIS. One comment expressed that salable mineral development may be required to support other development activities. General mineral comments included two comments which support mineral development within the planning area, one editorial comment, and one requested more information pertaining to the proposed opening of lands to mineral development within the planning area.

Another major subject of mineral comments was general concern about impacts to the environment from mining. These included concern about impacts from oil spills, construction of new roads, impacts to caribou, restoration requirements, and clean up of past mining activity. These comments have not been grouped within mineral management but rather to the specific resources perceived impacted.

b) General Recreation

General recreation, including Recreation Opportunity Spectrum (ROS) and Special Recreation Management Area (SRMA) received three comments. One comment requested clarification of "enhanced or excessive harvest," referring to ADF&G policy. One comment requested an editorial change to the ROS. Another comment requested SRMA to be included within the FEIS.

c) Travel Management

Approximately 4% of the total substantive comments received concerned recreation and travel management, including management of off-highway vehicles (OHV). Eight comments pertained to OHV. Four comments recommended alternative methods for gross weight vehicle restrictions. Two comments expressed that BLM should address the potential for increased OHV use within the planning area. One comment suggested BLM not use the State's "Generally Allowed Uses" policy. One comment required an editorial change. Three substantive comments were made regarding General Travel Management. One comment requested a source citation for R.S.2477 and 17(b) easements. One comment requested clarification within the document for managing travel by aircraft to BLM managed lands.

d) Renewable Energy

BLM received three substantive comments on renewable energy. One of the comments indicated that the Bay planning area would support geothermal energy. Another comment requested more information on renewable energy use be included within the FEIS. Another comment stated that BLM did not provide an adequate discussion of renewable energy potential within the DEIS.

e) Lands and Realty Actions

BLM received 17 substantive comments related to lands and realty. Subcategories for Land and Realty include: Lands, ANCSA withdrawals, and ANILCA concerns. Nine comments referenced the "no more" pledge of ANILCA for administrative or legislative set-asides of Federal lands. Four comments referenced ANSCA 17(d)(1) and the lifting of these withdrawals. Three comments requested BLM to provide more information or perform additional studies before lifting 17(d)(1) withdrawals, while another comment suggested it was poor timing for lifting 17(d)(1) withdrawals due to the proposed Pebble Mine. Two comments mentioned 17(b) easements requesting additional surveys. Another comment requested clarification of Recreation and Public Purposes (R&PP) within the FEIS. One comment preferred land leases over land sales.

f) Proposed Pebble Mine

Eight comments were received concerning Northern Dynasties proposed Pebble Mine. One comment suggested "the DEIS does little or nothing to stop the Pebble Mine." Another comment suggested BLM

"should develop special designation for Bristol Bay that would recognize threats posed by the Pebble Mine," which would provide protection for fish and wildlife. Other comments suggested that the FEIS contain updated information which can be used to provide an improved analysis of the impacts of the proposed mine.

g) Special Designations

About 7% of the comments regarded special designations. Of these, nearly 4% related to Areas of Critical Environmental Concern (ACEC). The remaining 3% were related to Wild and Scenic Rivers, Subsistence Only Areas, and general comments. This section is further broken down to ACECs, General Special Designations, and Wild and Scenic Rivers.

1. General Special Designations

General special designations included comments about two or more specific special designations within the same comment, i.e. WSRs and ACECs. One comment recommended the FEIS identify specific management goals, and the ROD commit to the development of future management plans for ACECs, RMAs, and WSRs. One comment recommended special designations as a method to close lands to mining, while another comment suggested that 40% of lands within the planning area currently are set aside by some special designations.

2. Areas of Critical Environmental Concern (ACEC)

Additional comments indirectly concerning ACECs were grouped in the Realty section through comments regarding the "no more" set-asides of land addressed in ANILCA. Six comments on ACECs included editorial and clarification suggestions. One comment suggested the name of the Carter Spit ACEC is misleading. Another comment suggested the eastern boundary of Carter Spit ACEC follow section lines rather than the watershed boundary. One comment requested 17(d)(1) withdrawals remain within ACECs.

3. Subsistence Only Areas

Three comments suggested BLM establish subsistence only areas adjacent to Native corporation lands in the Bristol Bay region.

4. Wild and Scenic Rivers (WSR)

One comment requested editorial changes to tables regarding WSR. One requested additional information concerning the process for designation of WSRs. One comment requested BLM defer the suitability determination of WSR until the land conveyance process is complete.

h) Social and Economic

About 10% of the total comments fell into this category. The majority of these comments were concerning Social and Economic. This section is further broken down to the following subcategories: Social and Economic, Environmental Justice, and Subsistence.

1. Social and Economic

Nineteen substantive comments were received on this topic. One comment provided information concerning increases in population resulting from increased development opportunities within the Bay planning area. Several comments questioned the economic benefit of resource development to the planning area residents. Concerns included lack of good jobs for locals, lack of involvement of local communities in development of resources, and the short-term benefit of development versus long-

term impacts to the environment. Other comments noted the need to promote resource development in order to provide economic opportunities and jobs in the region. A couple of comments questioned economic data and analysis of effects.

2. Environmental Justice

Two comments were received involving environmental justice. One comment noted that BLM did not adequately evaluate the possible effects of non-local hunters on local communities as part of its mandate to consider environmental justice. The other comment suggested the FEIS analyze potential impacts to low income and minority populations resulting from land management decisions.

3. Subsistence

Three percent of the total substantive comments pertained to subsistence. In addition, many comments under the Fish and Wildlife, Recreation, Climate Change, and Special Designation categories also related to subsistence. The subsistence comments generally expressed concern that BLM continue to provide access for subsistence, eliminate, reduce or mitigate impacts on subsistence users, and place emphasis on management of fish and wildlife for subsistence purposes. Many of these comments mentioned impacts to subsistence from BLM approved activities such as mineral development and recreation. Another comment recommended an overview study be performed on subsistence species within the Bristol Bay area before completion of the FEIS. One person noted that subsistence should be the top consideration within for all alternatives. Another comment suggested the demise of subsistence species resulting from increases in development and population would ultimately result in degradation to the Native lifestyle. Other substantive comments recommended adding more data concerning subsistence to the FEIS, while other comments were editorial.

i) RMP/EIS Process

Approximately 13% of the total comments were on process. This category is further broken down into: Process, Public Outreach, and NEPA Adequacy.

1. Process

These seventeen comments covered a wide variety of topics. Several comments related to the RMP/EIS process in general. Other comments requested further consultation with adjacent land managers and challenged BLM to be “compatible with those neighboring land managers.” Three comments requested extensions to the public comment period. Other comments suggested creating two RMPs rather than one RMP within the Bay RMP. Another comment suggested that Alternative B provides an “open door” for oil and gas exploration within the Bay planning areas without the benefit of the NEPA process. One comment explained that Congress specified the first purpose of regional management would be “to conserve the fish and wildlife and other natural and cultural resources within the region,” providing citation to ANILCA. Another comment requested that BLM clarify whether it would rely on the Bay RMP/EIS for future land management decisions.

2. Public Outreach

Three substantive comments were received on this topic. One comment suggested active citizens and community leaders were unable to attend the Bay DEIS public comment meeting held in Naknek, King Salmon, and Dillingham due to a conflict in schedule. Another comment suggested that public comment meetings be held in all villages within the Bay planning area. Two comments explained that most advertising methods for Bay comment meetings were ineffective.

3. NEPA Adequacy

Twenty-two comments concerned the NEPA adequacy of the analysis in the Draft RMP/EIS. About half of these related to the analysis of cumulative effects. Comments ranged from a perceived failure to analyze cumulative effects either generally or for specific resources, inadequacy of the cumulative effect analysis, or inadequate consideration of the area of effect and reasonably foreseeable future actions. Areas of concern included the cumulative effect of global climate change, land conveyance, and future transportation infrastructure. A few comments noted that the Draft RMP/EIS did not provide balanced alternatives, there being too much similarity between Alternatives B and D, and a lack of balance within the Preferred Alternative (D). The general concern is that the Draft EIS did not adequately consider the impacts of conveyance of land out of Federal ownership. One comment noted that the EIS did not consider the short-term benefits of mineral development versus the long-term effects on natural resources. Other comments noted that the analysis was too general, focused too much on minerals, or was not sufficient for specific resources.

j) General

Approximately 28% of the total comments fall under general. The General category is further broken down into: General, Maps, Climate Change, ROPs and Stipulations, and Editorial.

1. General Comments

This topic encompasses many comments that did not fit under other categories, ranging from rewording or reorganizing the document for clarification to requesting additional information concerning regulations and policies. One comment requested reducing the use of acronyms within the document.

2. Maps

Ten comments concerned maps. A majority of comments focused on improving the maps by displaying the geographic locations of features mentioned in the text on a map, labeling features on the maps, adding additional data to the legend or installing vicinity maps, changing color scheme, or correcting errors. Two comments recommended the addition of new maps, including a map showing easements and combining Native patent lands with private lands on maps.

3. Climate Change

Nine comments pertained to global climate change. More than half of these comments felt that the Draft RMP/EIS fails to adequately consider the effects of climate change, either in general or on specific resources such as subsistence resources, wildlife habitat, soils and hydrology. Several comments generally note that BLM needs to address the potential impacts of climate change more thoroughly. One comment noted that the final RMP/EIS should consider how the proposed actions, alternatives, goals and objectives may contribute to and/or reduce impacts to climate change.

4. Required Operating Procedures (ROP) and Stipulations and Abandonment, Removal, & Reclamation (ARR)

Twelve substantive comments related to this topic. Several recommended changes to specific ROPs and stipulations, or encouraged the development of strong ROPs to protect habitat. One comment suggested BLM has not analyzed the effectiveness of proposed ROPS/Stipulations, while another comment questioned how BLM would enforce its ROPS/Stipulations. One comment suggested stipulations are more effective than ROPS. One comment expressed concerns regarding the limited number of special designations, questioning the effectiveness of ROP/Stipulations especially with an Alternative that proposes the opening of lands to mineral exploration. In addition to comments

regarding ROPS/Stipulations, two comments were received regarding Abandonment, Removal, & Reclamation (ARR). Both comments requested that BLM consider requirements for removal of facilities once mineral development operations cease.

5. Editorial

Fifty comments were strictly editorial, including: correcting spelling errors, reformatting figures and text to improve readability, grammatical errors, and additions to the list of acronyms.

D. Response to Individual Comments

This section contains responses to specific comments, organized by the major topics used throughout the document. Some general categories were also included, to facilitate topics brought up the content analysis. Comment letters were assigned numbers when they were received and these numbers are used in this section of the document so that reviewers can easily find their comment and how we responded to it. Following the specific responses to comments is an index of comment letter numbers and the name associated with it as a cross reference for reviewers to find their individual comments. The index also shows which page numbers contain comments and responses to comments for each comment letter number that was assigned. Organizations and government entities are listed by the organization or the government agency rather than by the signature to the submission.

Table I.2. Response to Individual Comments

Resources

General Resource Protection

Letter-Comment#	Comment	Response
15-1	Instead of recognizing the Bristol Bay watershed as an asset integral to Alaskan's economy in its natural state, BLM's draft seems to promote industrial development that would put an end to that natural asset.	The Alaska Land Health Standards set forth land health standards that describe the desired ecological conditions and goals that the Bureau of Land Management (BLM) in managing lands throughout Alaska. This includes the Kvichak, Mulchatna, Nushagak, and Goodnews watersheds. Land health considers the needs and contributions of the affected ecosystem, including water, vegetation, soil, fish and wildlife habitat, heritage resources. Many sections in Chapter III identify the planning area as pristine (Air and Soils Resources) and having good [water quality] (Water Resources). Chapter III also identifies the importance and abundance of fish, caribou, and several types and species of bird, including special status species. Please refer to the Executive Summary which describes BLM's mandate by Congress to manage the land for multiple use and sustained yield.
50-1	The Kvichak, Mulchatna, Nushagak, and Goodnews watershed are all vitally important to a resource that is renewable. The habitat surrounding them can not withstand any form of degradation. If these areas are not fully protected, much more than just those plants and waterways will be affected. The potential impact could be harmful far down the Alaska Peninsula. Should anything go wrong in the future mineral development, the years that may take to re-establish what we already have as natural resources could be beyond our ability to calculate.	Please see response to comment 15-1. Future mineral development on BLM managed lands, if any, will be regulated and monitored through the NEPA process, other Federal agency environmental policies and regulations, mineral development regulations, etc. Also, please refer to Chapter III, section B.4.a) Mineral Development. Comments received concerning potential impacts resulting from alternatives proposed within the Bay DEIS were used to modify the effects analysis in Chapter IV within the Bay FEIS. Please refer to Chapter IV regarding potential impacts from surface disturbing activities.
46-3	The development or disposal of these Federal Lands could result in adverse impacts on the local environment including water and air quality, fish, and wildlife resources.	Please see response to comment 50-1.
69-5	Congress specified that the first purpose of management of the region would be “to conserve the fish and wildlife and other significant natural and cultural resources within the region.”	In addition to ANILCA 1203(b)(1), BLM's multiple use mandate also includes the provisions described in 1203(b)(2); 16 U.S.C. 3183 (b)(2) "to provide for the rational and orderly development of

Letter-Comment#	Comment	Response
	ANILCA § 1203(b)(1); 16 U.S.C. § 3183 (b)(1). According to a 1979 Senate Report: Bristol Bay is one of the most biologically productive marine areas in the world. It is a feeding area for millions of seabirds, thousands of marine mammals and countless other marine species. The estuaries that line its shores serve as staging areas for millions of migrating waterfowl. The many rivers and streams that flow into the Bay provide the spawning grounds for 16% of the world's red salmon, a fish of national and international significance as well as one of great value to the Alaskan economy. The red salmon alone would justify refuge status for much of the Bristol Bay drainage, but the lands are rich in other wildlife as well..." Senate Report 96-413, Nov. 14, 1979 at 252. We are very disappointed that the preferred alternative (Alt. D) of BLM's draft Bay RMP/EIS, fails to acknowledge the significance of BLM's undeveloped lands to maintaining healthy ecosystem function and to respond favorably to the public's request for "special management attention to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes" in the Bristol Bay watershed.	economic resources within the region [Bristol Bay] in an environmentally sound manner." Several areas within the document highlight the characteristics of the planning area (see response to comment 15-1). In addition, ROPS (Appendix A) have been developed in consultation with "permittees or lessees, public land users, and the interested public" to achieve plan objectives, meet standards, and fulfill the fundamentals of land health per BLM's Alaska Statewide Land Health Standards.
69-9	According to the draft Bay RMP/EIS, little is documented or known about fisheries resources and wildlife habitat present on the BLM lands in the Bristol Bay watershed. The list of references on page A-12 of the draft RMP identifies 6 academic and/or scientific resources specific to the Goodnews Bay and Carter Spit region. However, no specific references appear to describe Bristol Bay's resources. Likewise, Chapter III is vague and lacking in specific information regarding resource values on BLM's Bristol Bay lands. This chapter should be revised and expanded to include more comprehensive description of the lands' natural resource values, as well as the importance of their contribution to the proper functioning condition of the region's ecosystem. Additional on the ground research should be conducted by BLM specialists to fill gaps in this critical knowledge, and adequate funding should be allocated to ensure that this work is completed as soon as possible.	References pertaining to biological resources within the Bristol Bay area are found throughout Chapter III in the document. For example, please refer to Chapter III, sections B.5.a-e and 6c with references in the appropriate sections. Additional Information pertaining to water resources in the Bristol Bay area has been added to the Bay proposed RMP in Chapter III, section B.4. Future data collection efforts on BLM lands in the Bay planning area will be based on the magnitude and intensity of expected disturbance from proposed or permitted projects and the available of funding.

Letter-Comment#	Comment	Response
69-36	As part of an analysis of cumulative impacts under NEPA, BLM is required to consider reasonably foreseeable actions and discuss the cumulative impacts of both the proposed action, actions in the past, and those reasonably foreseeable actions in the future. BLM does not adequately consider the impacts of land conveyances. See 40 C.F.R. 1508.7. BLM should, at a minimum, provide further details and analysis concerning the lands selected. The conveyance of at least some of the selected lands is reasonably foreseeable; it is the location and the timing of the conveyances that is less clear.	Chapter IV, section B1 identifies BLM's inability to predict which selected lands will be passed over and remain within BLM jurisdiction. The Reasonable Foreseeable Development Scenario (RFD) for Leasable Minerals and the RFD for Locatable Minerals was used to determine impacts from these actions and others to BLM-managed lands and resources. This includes State- and Native-selected lands. Anticipated impacts to resources can be found in sections C, D, and E of Chapter IV.
3-15	Page 2-5 Detailed Description of Alternatives, Goals-BLM should emphasize avoidance of destruction, loss, or degradation of wetlands, air quality, water quality, soil quality, and natural resources, not simply minimizing that destruction, loss or degradation.	BLM's multiple use mandate includes the provisions described in 1203(b)(2); 16 U.S.C. 3183 (b)(2) "to provide for the rational and orderly development of economic resources within the region in an environmentally sound manner." In upholding these provisions degradation of resources can not always be avoided. As stated in Appendix A (ROPs and Stipulations), BLM will adhere to the BLM Alaska Statewide Land Health Standards and in doing so "minimize" or ensure "undue or unnecessary" degradation will occur from permitted activities.
31-1	BLM fails to recognize the impossibility by the very nature of the type of development that the extractive minerals industry can not possibly exist without the massive destruction, elimination, or disruption of vital habitat for the fish and wildlife of the region. The BLM further neglects to realize the massive negative environmental cumulative affects of a mining “district” that could easily be formed in the region should the infrastructure for the first mine be allowed to be constructed.	Please see the responses to comments 50-1 and 4-3.
14-1	The draft fails to value the natural resources of the unspoiled Bristol Bay watershed. These include a world-class fishery, important mammal populations on land and in the water, many resident and migrant birds. To Alaskans these are an outstanding part of their state. BLM should recognize these values as a great national asset worthy of preservation.	Please see the discussion of resources in Chapter III, section B. References pertaining to biological resources within the Bristol Bay area are found throughout Chapter III and can be found in the reference section.

Water/Hydrology

Letter - Comment#	Comment	Response
2-1	Groundwater Resources: The document doesn't describe the groundwater resources in the planning area (Section 4, Water Resources) and assess the potential effects of the proposed alternative on these resources (Chapter IV beginning on page 4-18).	Text has been added in Section B4 of Chapter III stating that no groundwater data has been collected on BLM lands in the Bay planning area. A reference to internet available USGS groundwater data has also been added. Potential impacts to groundwater resources are briefly discussed in Chapter III, section E.1.b. Hazardous Material Management and Chapter IV, section B, sub-sections 1.c.1, 3.a.1, and 4.a.5.
5-5	Page 2-7, b) Soil Water and Air,(1) goals, and (3) Management Common to All Action Alternatives (B,C, and D)These sections generally describe goals and management of soil, water, and air. No resources in the Bay Area are specifically identified. The goals and "Management Common to All Actions" sections intertwine the discussion of water resources with air and soil. Since the desired outcomes of this section are tied to the standards and goals of the Clean Water Act, mixing these three resources does not provide an effective discussion. A separate discussion of water resources would be beneficial and provide a better foundation for management decisions. The major watersheds and surface water bodies in the Bay Area should be discussed separately from air and soil. Specifically identifying watersheds that may need special protection from the standpoint of human health concerns, ecosystem health, or other public concern would enhance this section of the RMP. Additionally, please consider adding a reference to a Quality Assurance Project Plan in the following goal. (a) Management Excellence promote program financial efficiency and improve data quality and availability through a Quality Assurance Project Plan.	Chapter II, sections D.1.b.1 and D.1.b.3 provide an overarching description of programmatic resource goals. Specific identification of resources in the Bay planning area is in Chapter III of this document. The grouping of air and soil resources with water resources is a programmatic grouping of similarly managed resources, as is the grouping of fish with wildlife resources. The desired outcomes for each of these resources are defined in BLM Alaska Statewide Land Health Standards (Appendix A) as stated in Chapter II, section D.1.b.1. For water quality, this outcome is ultimately tied to the standards and goals of the Clean Water Act. ROPs and Stipulations (Appendix A) will be used to achieve these desired outcomes. BLM believes this grouping is appropriate within this section of the document. In addition a reference to Quality Assurance Project Plan has been added to Chapter II, section D.1.b.3.a.

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5-6	Page 2-7 (3) Management common to All Action Alternatives (B, C and D) (a) "Inventory and Monitoring: Develop a water quality sampling protocol step down plan and determine baseline water quality values in areas having critical aquatic habitats or have potential for significant impacts due to permitted activities. Monitor for significant alterations to water quality value and water flow in accordance with State and Federal regulations." This paragraph indicates that the BLM will develop a water quality sampling protocol to determine baseline water quality values for areas with critical aquatic habitats or have the potential for significant impacts from permitted activities. A Quality Assurance Project Plan (QAPP) that meets applicable State and or EPA requirements listed on the following web sites should be developed to ensure the quality of collected data: http://www.dec.state.ak.us/water/wqsar/pdfs/qappelements.pdf EPA Requirements for Quality Assurance Project Plans are addressed at: http://www.epa.gov/r10earth/offices/oea/epaqar5.pdf To clarify, a Quality Assurance Project Plan describes the activities of an environmental data operations project involved with the acquisition of environmental information and describes the necessary QA/QC procedures and other technical activities to be implemented for a specific project.	References to ADEC Quality Assurance Project Plan elements, EPA Requirements for Quality Assurance Project Plans, and U.S. Geological Survey, National Water Quality Assessment (NAWQA) have been added to Chapter II, section D.1.b.3.a in the Bay FEIS.
5-16	Table 2.13, Required Operating Procedures Page 2-62, ROP Water -5b We request that Water -5b be modified to provide consideration for spill prevention and control measures as well as terrain constraints that may be encountered in specific areas along a stream.	Please refer to Appendix A, section E: Hazardous Material Use and Waste Management, Stipulations 11 and 13-24, which deal with spill prevention and fluid storage. Also, specific spill prevention requirements for each individual proposed project will be addressed within project-specific NEPA analysis and mitigation measures.

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5-27	Chapter IV-ENVIRONMENTAL CONSEQUENCES Page 4-4 (3) Water Resources (a) "Demand for clean water will increase should recreation use, population, commercial development, or infrastructure development increase. Water quality requirements would be achieved through the use of the Required Operating Procedures (ROPs)." This section identifies Required Operating Procedures as the method for achieving water quality requirements. Please clarify how all of these methods will be used to protect water quality. We suggest including a section in chapter II (page 2-58) following the discussion of Required Operation Procedures, Stipulations, and Standard Lease Terms that explains when mitigation measures, use restrictions, and other conditions can be attached to a project, permit, or other BLM authorized activity.	Please see Appendix A, Introduction, and sections 1-3.
2-2	Page 3-29, Section III.B.4 Water Resources, second paragraph: Where natural resource data and information are available for the planning area, such as for the two USGS streamflow gaging stations mentioned in the paragraph, it would benefit the public if the document included a summary of the available data or references/Internet links accessing for the information.	Website references to USGS stream gages and groundwater information has been added to Chapter III, section B.4.
29-1	Hard Rock mining, in particular, poses a very high risk to the water quality necessary for the region's abundant salmon runs. According to the EPA, it has polluted 40% of western watersheds in the continental US.	Though we are unaware of the 40% figure, ROPs will be placed on mining operations to prevent impacts to water quality. In addition, please see response to comment 4-3.
32-1	According to the EPA, it has polluted 40% of western watersheds in the continental US.	Please see response to comment 29-1
38-2	All watersheds need to be protected from mixing zones	Alaska Department of Environmental Conservation (ADEC) is tasked with permitting pollutant discharge in Alaska. Please see response to comment 4-3
43-1	Stuyahok Limited hereby requests the State of Alaska, DEC, EPA, or any other entity not allow any type of dumping or mixing zones into the rivers and lakes of Alaska and opposed to mixing zones in the pebble mine	Please see response to comment 38-2

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2-4	Page 4-27, Section IV.C.3.c(3), Water Resources, last paragraph on page 4-27 continuing on page 4-28: The paragraph provides two contradictory interpretations of the effects of a large spill-the first from the Northeast NPR-A study that predicts toxicity would persist for days to weeks, and the second from research after the Exxon Valdez oil spill, that found pockets of toxicity persisting for ten to fifteen years. It would benefit the reader if this document would explain which of these studies is more likely to reflect conditions in the planning area.	Based on your comment, BLM has removed this comparison from the FEIS. Impacts associated with spills are addressed in Effects to Fisheries and Aquatic Habitat, located in Chapter IV, section C.4.c.2.
5-1	Water Resources: We request that BLM consider additional in-depth, specific discussion of water resources in the area. A complete inventory of water bodies would enhance the discussion on water resources as would a thorough analysis of the impact on water quality anticipated from the proposed alternatives and current resource uses. This use analysis should include water quality impacts associated with exploration and development of natural resources, infrastructure development and use of off highway vehicles.	Initial inventory of water resources is conducted in conjunction with project demand (development). ANSCA 17(d)(1) precluded development within much of the Bay plan boundaries. Please refer to Chapter II, section D.1.B.3.a and Chapter III, section B.4. for information concerning water resources inventory in the planning area.
5-2	Executive Summary Page V, Page VI, Alternative C and Alternative D: Please consider adding "water quality" to this description as indicated below in italics as an additional benefit of the OHV limited designation is protected water quality. "All BLM-managed lands within the planning area would have a "limited" OHV designation, allowing for limitations to be placed on OHV use to protect habitat, water quality, soil and vegetation resources, and/or recreation experiences."	Your suggestion has been incorporated in section E.3 and E.4 of the Executive Summary

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5-4	Chapter II-Alternatives Page 2-7 b) Soil, Water, and Air: Although goals and management decisions related to water quality are included on page 2-7, the following goals for water resources identified in the Kobuk-Seward Peninsula Draft RMP are more concise and cover key non-point source water quality concerns regarding stream banks, wetland vegetation and prevention of soil erosion. (a). "Air and Water quality should meet or exceed local, State, and Federal requirements." (b). "Ensure that watersheds are in or are making significant progress toward a properly functioning physical conditions that includes steam banks, wetlands and water quality." (c). "Minimize negative impacts to soils and wetland vegetation and prevent soil erosion." In addition, the actions to achieve the goals, objectives and desired future conditions are not fully articulated in the Bay Area plan. Further discussion of actions would be beneficial.	Chapter II, section D.1.b.1 identifies the use of BLM Alaska Statewide Land Health Standards (Appendix A) to "Maintain desired ecological conditions" to include water resources. The "actions" to achieve goals, objectives, and desired future conditions, established in the BLM Alaska Statewide Land Health Standards, are to, first, establish and then enforce ROPs and Stipulations (Appendix A) that protect soil, water, and air resources. In addition, inventory, monitoring, and analysis of these resources will be conducted as required.
7-1	Not only is this an area of legendary volcanic activity, putting dams at risk, but in other parts of the country where this type of mining takes place, it is well known that the mining byproducts leeching out of these newly formed lakes invariably pollute the surrounding water table. The EPA has, in fact, labeled the hard rock mining industry as the largest source of pollution in the entire country. I would urge you take a close look at the dismal track record and folly of these foreign mining interests, at the acid and cyanide runoff that have devastated streams throughout the west and left taxpayers holding the bag for astronomical cleanup costs.	BLM does not have influence concerning activities (proposed Pebble Mine) occurring on State managed lands. In addition, please see the response to comment 50-1 and 4-3.
8-1	Even minute quantities of leached toxins associated with hardrock mining are deadly to juvenile salmon and trout. According to the US Environmental Protection Agency, the hardrock mining industry is the biggest toxic polluter in the country, which does not bode well for the health of the Bristol Bay wild salmon-based economy.	Please see the response to comments 50-1 and 4-3.
9-1	Any hard rock mining using cyanide heap leaching to extract gold is a 1-way ticket to a superfund site. Just a few drops of cyanide on the water will kill fish downstream several miles away within a couple of hours.	Please see the response to comments 50-1 and 4-3.
60-4	The draft also notes that adequate water data is lacking regarding instream flows and the related need for flow reservations. Yet the RMP fails to propose sufficient measures to obtain such vital data. Critical baseline data about stream flows is absolutely necessary if the Draft RMP's conservation goals are to be achieved.	Please see response to comment 5-1. Inventory, monitoring, and data requirements for water resources is discussed in Chapter II, section D.1.b.

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60-17	…the document concludes that "groundwater drawdown and associated impacts to surface waters and nearby wetlands can be a serious concern in some areas." The impacts resulting from groundwater drawdown could last for several decades. Unfortunately, these conclusions are not reflected in other elements of the draft RMP creating a substantial disconnect between the fact and the policy proposal to facilitate mining activity on over 1 million acres of public land in the Bristol Bay drainages.	ROP Water 6a (Appendix A) has been developed to mitigate environmental and biological impacts associated with water withdrawal. Proposed projects would need to show that beneficial uses would be supported. Impacts to resources from the alternatives proposed within this document are analyzed in Chapter IV. Municipal and industrial use of groundwater and surface water are regulated by Alaska DNR and applications concerning impacts to wetlands seek approval from the Army Corps of Engineers under Section 404 of the Clean Water Act. Also, see response to comment 4-3.
5-7	Page 2-7, (a) Inventory and Monitoring: The inventory of water resources in the Bay Area is minimally addressed in this section. Please refer to 4) Water Resources on pages 3-15-3-19 of the Kobuk-Seward Peninsula Draft RMP/EIS. This discussion of water resources along with Table 3-1 Water Resources Data for Selected Rivers in the Planning Area (2004-05) includes specific information about water resources that will effectively guide management decisions. In addition, please consider including the following inventory and monitoring item. (a) Assess impacts from OHV trails especially in high use areas where riparian and wetland resources are at risk.	Please see response to comments 5-1and 5-4. Currently there are very few permitted activities occurring on unencumbered BLM lands within the planning area. Implementation of the preferred alternative may result in increased permitted activities on BLM-managed lands within the Bay planning area. Increased inventory and monitoring of soil, water, and air resources will be addressed within project-specific NEPA analysis resulting from any application for permit. ROPs and Stipulations (Appendix A) will be used to achieve desired ecological outcomes as defined in the BLM Alaska Statewide Land Health Standards (Appendix A). Please refer to Chapter II, section D.1.a.4 for inventory and monitoring of riparian and wetland resources from OHV use.
69-35	We also request that BLM consider “Comparison of Predicted and Actual Water Quality at Hardrock Mines” (Maest, Kuipers, 2006). A summary of the report is attached to this document and the full study is available at http://www.mine-aid.org/	Thank you for the suggestion. Please see response to comments 4-3 and 5-4.
70-5	…the plan does not adequately assess the magnitude of the risk to this watershed [Bristol Bay] of hard rock mining. The geology of the region indicated the high presence of sulfites in the rock to be disturbed in hard rock mining operations.	Chapter IV: Environmental Consequences, has been revised in the FEIS compared to that offered in the DEIS. In addition, please see response to comment 4-3.
4-3	Concentrated groups of eider feeding at the mouth of Goodnews Bay in Spring when the head of the Bay is still frozen, to avoid risk of secondary exposure of Steller's eiders to contaminants via their intertidal forage, good water quality must be maintained in Goodnews Bay.	Permitted activities on BLM-managed lands will comply with all State and Federal regulations, including water quality. ROPs and Stipulations (Appendix A, ROP: Special Status Species) have been developed and will be used to protect Steller's eiders.

Fish and Wildlife (Including Special Status Species)

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	Fish	
38-1	There are no baseline studies of fresh water fish spawning times. These studies will be required.	A reference to ADF&G data concerning anadromous run timing has been added to the document. Please see Chapter III, section B.6.i.
60-9	Pg. 3-134-"Lack of detailed baseline data" regarding fisheries on BLM lands in the Bristol Bay region is identified as a problem. Given the insufficient data exist regarding these critical fisheries, BLM is in no position to open over 1 million acres to mining claims and development before it can assess the adverse of negative impacts of such actions on Bristol Bay's fisheries.	The ADFG is charged with monitoring fish population in Alaska. BLM will use ADFG data (where applicable) to asses project-specific impacts to fisheries. ROPs, stipulations, and standard lease terms will be used to protect fish habitat. Please see response to comment 4-3.
60-13	Pg. 4-41. These references to "fisheries impacts" are way off. First, it equates the impacts of opening over 1 million acres to mining (Alt. D) with the impacts associated with Alt. C…A contrary conclusion is presented at pg. 4-10. It also contends to a variety of stipulations, operating requirements, etc. will offset the adverse impacts associated with opening over 1 million acres to...mining. It is impossible....to assess the accuracy and efficiency of these conclusions until the agency resolves the status of lands within the ACEC. IF the lands are closed, than the differences between Alts. C and D are substancially contrary to the representations is this crucial section. If those lands are open, then C is akin to D and the DEIS fails to include a reasonable range of alternatives.	Chapter IV within the FEIS has been modified compared to that offered within the DEIS, including effects to fisheries. The effects analysis from mineral development presented in the FEIS predicts impacts based of the proposed alternatives and development assumptions and methods, section B. The use of ROPs, Stipulations, and standard lease terms, along with project-specific NEPA analysis, can prevent undue or unnecessary degradation of resources. Please see response to comment 27-1.
26-2	The State of Alaska's Board of Fisheries Policy for Management states that "in the aggregate, Alaska's salmon fisheries are healthy and sustainable largely because of abundant pristine habitat and the application of sound, precautionary conservation practices" (5AAC39.222 (a) (1)). If the BLM is truly consistent with the policy and goal of the State of Alaska, mining operations are disqualified from the regions of our world class fisheries by their nature.	Please see response to comment 69-5.

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69-8	…if the Alaska Board of Fisheries (BOF) recommends the establishment of a fish refuge for the Kvichak and Nushagak drainages, we request that BLM lands be included in the designation, and management objectives adapted to ensure consistency. Therefore, this expresses additional justification for our belief that the designation of BLM's Bristol Bay lands as an Area of Critical Environmental Concern (as described in Alternative C) is an appropriate and necessary action that will establish pro-active special habitat conservation and sustainable use measures for these federal public lands and promote cooperative, compatible future management according to enhanced State standards and refuge status within the Bristol Bay watershed.	In the event the State of Alaska designates a fish refuge within the Bay planning area, BLM will reevaluate decisions made within this RMP concerning lands adjacent to said refuge within a plan amendment or revision (BLM Manual H-1601-1, section VII).
Wildlife		
46-1	The Carters Spit, Jack Smith Bay area is an important nesting ground to different species of water fowl, Geese, and shore birds.	Chapter III, section D.1.b. describes the Carter Spit area and the Carter Spit ACEC proposed under Alternatives C and D. Also, refer to Chapter III, section B.6.h, which describes bird species in the Carter Spit area.
4-5	Carter and Jacksmith Bays are important to migrating Steller's eiders, which have been observed during aerial surveys in the hundreds (Dau and Mallek 2002, Larned 2002).	Thank you for your comment, please see the response to comment 4-2 and 46-1.
5-9	Page 2-30, Table 2.7, Fluid Leasable Minerals-Summary of Alternatives: Please check the acreage figures for Alternative C. in Areas Open to Fluid Mineral Leasing Subject to Standard Lease Terms. It is unclear how 1,176,629 acres can be State-or Native-selected in alternatives B and D but no acreage is selected in alternative C. Also, please include the additional seasonal restrictions for migratory birds, shorebirds, and raptors in the table consistent with the text.	These changes have been made to the FEIS. Seasonal restrictions have been added to the ROPs (Appendix A, Special Status Species) in recognition of federally-listed migratory bird species.
69-24	…right of way exclusion areas should include all critical habitat for the Mulchatna caribou herd as designated by ADF&G, including important migratory pathways.	Accommodation of caribou migration patterns is addressed on a case by case basis as those patterns are dynamic, very much dependent on range health, and unpredictable as described in Chapter III, sections B.6.b and B.6.d1.
4-1	Endangered Species Act of 1973 (16U.S.C. 1531 et seq:87 stat884, as amended; Act). Steller's eiders, listed as threatened under the Act in 1997, migrate and stage within the Bay Planning Area. Additionally, nesting Kittlitz's murrelets, a candidate species, have been observed within the Bay Planning Area.	Your concerns have been recognized within this document. Please refer to Chapter III, section B.7.c and Table 3.11 which identifies the status of Steller's eider and the Kittlititz murrelet. Also, refer to ROPs and Stipulations (Appendix A) for mitigation measures for these species and their habitat.
4-2	In spring, Steller's eiders migrate from their wintering grounds in the Aleutians and Alaska Peninsula, up the coastline to their breeding grounds that begin at the mouth of the Kuskokwim River and	Please refer to Map 1.1. Though Goodnews Bay is important to migratory birds, few acres of unencumbered BLM land exist near the coast with the exception of lands at and north northeast of

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	continue north. Goodnews Bay is a very important migration and staging area for Steller's eiders. Disturbance to Steller's eiders during the spring and fall migration may result in "take", defined as to harass, harm, pursue, hunt, shoot...	Carter Spit. BLM has proposed an ACEC for Carter Spit. Please refer to Chapter II, section D.3.a.5.a and Chapter III, section D.1.b.1. Unencumbered BLM lands within the proposed Carter Spit ACEC have been acknowledged for their importance to migratory birds. ROPs, Stipulations, and Standard Lease Terms (Appendix A) will be used to protect undue impacts to resources, including eiders.
4-4	Since Steller's and spectacled eiders are not known to breed within the Bay planning area, conducting aerial surveys of eiders on the breeding ground prior to oil and gas development is not a very meaningful Required Operating Procedure.	ROPs, Stipulations, and Standard Lease Terms (Appendix A) have been changed based on this information.
69-34	Since there is not a coordinated “working group” for the Mulchatna herd, the authoritative findings and habitat management requests of the Western Arctic Caribou Herd Working Group should be reviewed by BLM’s Anchorage Field Office and consistently applied to the Final Bay RMP/EIS.	Text has been added to Chapter III, section B.6.d.1 describing efforts to develop a coordinated working group for the Mulchatna Caribou Herd.
69-42	The draft EIS acknowledges that waterfowl populations have been dropping in the area for decades, but does not predict future drops or provide strategies for dealing with the decline.	The ADFG and USFWS are both more formally charged with monitoring and protection of wildlife populations on State and Federal lands. BLM does address impacts to wildlife and wildlife habitat as required by NEPA for specific land use proposals. Please refer to Chapter IV, Effects to Wildlife, for anticipated impacts to wildlife resulting from the Alternatives proposed in the FEIS.
1-3	300' setback is not adequate protection for riparian habitat along the East and South Forks of the Arolik River, Faro Creek, and South Fork Goodnews River (p. 2-81 and 2-85) stringent standards for all applicable major waterways in the planning area, rather than just these four streams.	Thank you for your comment.
5-20	Oil and Gas Leasing Stipulations Page 2-81, Stip-10: We assume this should be corrected to read: "…provide a 300 foot buffer from drilling operations on BLM-administered lands…"	This Stipulation in the FEIS has been altered compared to that offered in the DEIS. Please refer to Appendix A for these changes.
20-1	Particularly when 80 percent of the gold produced in the US is used for something as frivolous as jewelry, it would seem senseless to destroy a world renown fishery, both sport and commercial and unique natural area and resources to construct a massive dam system on a major earthquake fault. Also, copper dust that would infiltrate streams has been shown to destroy salmon's natural ability to return to spawning rivers and streams.	Thank you for comment.

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55-29	Pg. 4-34, (4) Effects to Fisheries, 4th paragraph, last sentence. This statement needs to be clarified. Existing regulations and the permit process provide significant protection for the riparian habitat. Modern placer mining impacts are mitigated and of short time duration. The last sentence of the next paragraph also needs clarification. New stream channels developed prior to and/or during the reclamation process, can be designed according to permit requirement so that the natural stream gradient and habitat diversity is maintained or improved. These facts should also be included as part of this discussion.	Thank you for your comment.
60-7	Page 3-24, This section relates that soil conditions north of Iliamna and near the Kvichak River pose "slight to very sever drawbacks" to road location and construction. Although we agree, this section fails to adequately address the adverse consequences of road construction, maintenance, and heavy traffic on fish and fish habitat.	Chapter III describes the affected environment or current characteristics of the region. Please see Chapter III, section A.1. Currently, there are few roads on BLM-managed lands with in the Bay planning area. Please reference Chapter IV, Environmental Consequences, section C.4 for a description of impacts to fisheries and aquatic habitat from soil erosion, including road construction.
60-16	Pg. 4-119 - The widely, and legally deficient, uneven nature of the Draft RMP is revealed by these references to fisheries impacts. Here, at the end of the document, there is belated acknowledgement that mining and related infrastructure cased "unavoidable direct disturbance to aquatic and riparian habitat would require many years (20-50+) to rehabilitate to healthy functioning condition." RRC agrees and urges BLM to rewrite other sections of the RMP/DEIS to be consistent with this conclusion.	Chapter IV provides a description of the predicted consequences on the biological environment resulting from the proposed alternatives, section A. These consequences are predicted using an interdisciplinary team, including a fisheries biologist. See response to comment 60-13
69-7	Presently, a sub-committee of the Alaska Board of Fisheries (BOF) is considering the need for higher standards for conservation of fish and wildlife habitat and related habitat in the Bristol Bay region. It is expected that the Alaska BOF will ultimately recommend that stronger measures are established by the Alaska Legislature in the form of a fish and game refuge or other similar designation. If established, prospecting mining operations will likely be required to demonstrate an ability to ensure conservation of water quality, in-stream flows and protection of fish and wildlife habitat and public uses, especially subsistence activities.	Thank you for your comment.

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69-33	All proposed/recommended 300-foot riverbank setbacks (for both locatable and leasable mineral management) should be “minimum” setback distances and that in the Final RMP the BLM explain how they arrived at 300 feet for an adequate riverbank setback.	The 300-foot buffer also has origins in the Forest Ecosystem Management Assessment Team (FEMAT), 1993, Forest ecosystem management: An ecological, economic, and social assessment. (USDA Forest Service, National Marine Fisheries Service, Bureau of Land Management, Fish and Wildlife Service, National Park Service, and Environmental Protection Agency. Portland, OR and Washington, D.C). Information regarding the development of ROPs and Stipulations can be found in the Introduction of Appendix A.
25-1	Trout Unlimited has submitted written testimony on the Bay RMP Draft EIS and included with it the report entitled "Economics of Wild Salmon Watersheds: Bristol Bay Alaska", by Duffield, Patterson, Neher, and Goldsmith written for Trout Unlimited and dated July 2006. It has come to the attention of the authors that the report contains an error in the estimation of the number of sportfishing visitors to Southwest Alaska, and that the error invalidates the conclusions regarding the total economic impacts of sportfishing on the regional economy. Consequently the report and any conclusions stemming from it in the Trout Unlimited testimony should be disregarded.	Data from this work was not used in the development of this plan.

Vegetation

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23-2	Once the natural environment is destroyed it will take hundreds, if not thousands of years for Nature to grow back to the way it was. This is due to the fact that Bristol Bay is in a Northern Biosphere, and all you have to do…. Some trees are so old, that you have to take a microscope to count the tree rings. A tree in Bristol Bay might be only 2-4 inches wide, but might be over 100 years old.	Thank you for your comment.

Cultural/Paleontological Resources

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39-2	Historical and grave sites should be identified.	Though we understand your concern, section 9(a) of the Archeological Resource Protection Act restricts access to information concerning the nature and location of any archeological resources.
46-2	The Carters Spit, Jack Smith Bay area, Snow Gulch, also has historical villages that were located in the region in which our ancestors practiced the traditional way of life by hunting, fishing, gathering and sharing this harvest with our families, community, and our Elders.	This information has been recognized in Chapter III, section B.9.a, Cultural Resources, within the FEIS.

Visual Resource Management

Letter-Comment#	Comment	Response
5-8	Page 2-20. Table 204, Visual Resource Management-Summary of Alternatives. It would be useful, if possible, to include in Table 2.4 the percentages of land that would be Class III and Class IV for each Alternative, for comparison.	Percentages of VRM class have been added to Chapter II, section D.1.h.4.
5-32	Page 4-78, Summary of Effects to Visual Resource Mgt. (Alternative A) / Page 4-79, Summary of Effects to Visual Resource Mgt. (Alternative B) / Page 4-80, Summary of Effects to Visual Resource Management of Alternative C /Page 4-81, Effects of Visual Resource Management Summary of Alternative D This is an extremely handy inclusion and we recommend that a similar summary follow the effects evaluations for each Alternative in each resource management category, not just Visual Resource Management. The summary usefully goes over the main points of each effects evaluation and assists the reader with framing the overall effects on that resource for each Alternative.	A summary of effects is found in Chapter II, Table 2-13.
5-33	Page 4-78, Effects to Visual Resource Management from Leasable, Locatable, and Saleable Minerals (Alternative B): The first sentence speaks to the localized adverse effects to OHV use through Stips and ROPs but it appears to be out of context. Please review.	Chapter IV has been revised in the FEIS compared to that offered in the DEIS.

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24-1	Visual Resource corridors should be a general guide used by permitting agencies and not part of a Resource Management Plan. Buffers are included in reserves and adding additional buffers significantly enlarges reserves without regard to the factors used to establish them. Corridors along transportation routes would result in a patchwork of withdrawals which would add unnecessary complexity to resource use and land management. Again, the permitting agencies should evaluate each project and have the flexibility to apply visual resource management as they determine best suited for that particular situation.	As described in Chapter I, section A, the Bay RMP will "provide a comprehensive framework for managing and allocating uses of public lands and resources" within the Bay planning area. This includes Visual Resource Management (VRM). BLM is responsible for designating VRM classes to unencumbered lands as part of this document. VRM classifications are not reserves but rather provide a threshold for planning and subsequent permitting purposes. Descriptions of VRM classifications are found in Chapter II, section D.1.h.1. BLM will evaluate impacts of proposed permitted activities through process established by NEPA.
44-2	Your draft resource management plan lists classes of VRMs. VRM classes III and IV are totally unacceptable from our perspective, they allow too much development. VRM class III could be acceptable depending on more details of this class. At this time, VRM class I is the only acceptable plan that will preserve our way of life.	BLM's multiple use mandate also includes the provisions described in ANILCA 1203(b)(2); 16 U.S.C. 3183 (b)(2) "to provide for the rational and orderly development of economic resources within the region [Bristol Bay] in an environmentally sound manner." Impacts to resources from proposed permitted activities will be evaluated through the NEPA process. ROPs will be applied to permitted activities to prevent unnecessary impact to resources on unencumbered BLM lands within the Bay planning area.
60-5	Pg. 2-18....Once again, it is inconceivable that the visual resource conservation goals articulated in the Plan can be achieved given the industrial consequences of two to four new lode mines in the region predicted to arise from adoption of Alternative D.	Please see response to comments 4-3, 29-1, and 44-2. Effects from mineral development are discussed in Chapter IV.
58-2	Visual Resource "buffers" should not be used. ANILCA specifically included very large areas of land which include buffers. No added "buffers" are justified.	ANILCA, section 1326 does not refer to buffers but rather conservation system units, national recreation areas, or national conservation areas. Please see response to comment 24-1.
1-2	Possible mineral development in the Goodnews Bay block has the potential to alter the wilderness character of the adjoining federally-designated Togiak Wilderness Area.	Regulations require that BLM plans be consistent with officially approved or adopted resource related plans of other agencies to the extent those plans are consistent with Federal laws and regulations applicable to public lands as described on page 1-22 (43 CFR 1610.3-2(a)). Please refer to Chapter II, section B.4. BLM has proposed a one mile VRM III buffer where its lands border the Togiak NWR. Please also see response to comment 4-3.

Resource Uses

Minerals

Letter-Comment#	Comment	Response
23-1	The mineral laws have not been updated hardly at all since they were created in the 1870's. The current laws do not put any burden on the mining companies to clean up after they've destroyed the natural ground cover or polluted the water systems. It's easier for the mining companies to go and declare that they're bankrupt rather than clean up their mess. The mine owners then don't have to pay anything to clean up; they take no financial responsibility to clean up after the minerals are mined.	To ensure maximum protection of public lands that are open to mineral entry under the mining law, BLM has developed regulations found in 43 CFR 3809 and 3715. 43 CFR 3809 deals with Surface Management of the mining site and 43 CFR 3715 which deals with Use and Occupancy of the mining site. Of particular importance is the requirement in both sets of regulations that surface disturbing activities can not create undue or unnecessary degradation of public lands. These activities must also meet all applicable Federal and state laws or regulations (for example COE, EPA ESA etc). In addition, 43 CFR 3809 stipulates when financial guarantees (bonds) are required.
55-8	Pg. 3-181, (1) Mineral Terranes. " Unmapped areas are generally evaluated as having poor to only moderate mineral potential." This is a dangerous assumption, especially in an under explored region such as the Bay planning area, and should be changed to reflect the great opportunity that may exist.	BLM's assignment of mineral potential is made to facilitate planning and not as "notice" to the public of value. For example, an assignment of low potential indicates that BLM anticipates low exploration and/or development activity during the life of the plan. Assignment of potential is made on the basis of presently available geologic information.
60-6	It is impossible to obtain bonds of sufficient size and value to cover the full cost of cleaning up and restoring land, river, stream and groundwater in the wake of massive open pits, huge tailings dams and toxic sediment dumps.	Reclamation and bonding is addressed through Plans of Operation and Notices of Intent prior to approval of mining operations, 43 CFR 3809.
58-1	Alternative B would allow maximum access to mineral resources, thus fulfilling the promise of Alaska's statehood.	Thank you for your comment.
58-3	"The Promise of Statehood." The intent of Congress in 1959 was for the New State of Alaska to become self sufficient. This was to be accomplished in part through the selection of 105 million acres of Federal land. …most Federal land in Alaska at that time were available for resource development to help provide jobs that would positively impact economic development of Alaska. This land was closed to development by ANCSA in 1971 and ANILCA in 1980. BLM manages only 27% of Federal land in Alaska. Only a small portion of that land is currently open to resource development. As a multiple use agency, BLM should have its goal, the opening of all possible lands to resource development. (Para)	Please refer to the Executive Summary, which describes BLM's mandate by Congress to manage the land for multiple use and sustained yield.

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51-1	I can't underscore the importance of not locking away the platinum resources in the Goodnews Bay area – it's a matter of national security because our energy security will one day be closely linked to our access to platinum for catalysts for fuel cells. A new generation of integrated circuits are currently under development that require platinum. This vilal metal is in short supply world wide, and it would be very short sided to lock this resource away.	Thank you for your comment.
55-9	Pg. 3-181, (2) Geologic Units. The first paragraph in this section provides a strong argument for opening the Bay planning area to modern mineral exploration. "The area is not as well mapped as other parts of the state…. Many of the geologic maps for this region are old..."	Thank you for your comment.
55-11	Pg. 3-182, (3) Minerals Occurrence, Figure 3.80. The region in the vicinity of LSS 1-3 (including Illiamna Project D and H Blocks) should be shown as having high potential for locatable mineral potential based on the relatively recent exploration efforts, including drilling, conducted by TNR Gold Corp. (www.tnrgoldcorp.com). TNR's findings are clear proof that the area has high potential for locatable minerals.	Maps depicting mineral occurrences are created using data from Bristol Construction Services, LLC, 2006. Mineral Occurrence and Development Potential Report Locatable and Salable Minerals. Please see response to comment 55-8.
55-16	TNR Gold Corp's work in the Illiamna Block is recognized here. Again, this area should have high potential for locatable minerals. The findings by TNR Gold Corp. are clear proof of that fact.	Please see response to comments 55-11 and 55-8.
55-27	Pg. 4-10, (3) Salable Minerals, 4th bullet. Mineral material sales will likely also occur in association with mining activities and with any local community construction. For example, limestone may be needed for milling processes and sand, gravel, and rock may be needed for construction.	This has been addressed in Chapter IV (salable minerals section) in the FEIS.
55-32	Pg. B-14 & 15, Exploration and Development Activities Illiamna/Kvichak Area. The appendix recognizes the drilling completed in the Illiamna D Block by Geocom resources. This is evidence in support of identifying the areas near the D and H Blocks as having high locatable mineral potential on Figure 3.81.	Please see response to comments 55-8 and 55-11.
56-2	It is premature for the BLM to open lands in this area to large scale mineral exploration while the state is reviewing habitat protections for areas within the Bristol Bay watershed. Federal and State managers must coordinate their efforts to protect the renewable resources found within the Bay planning area and State controlled lands, as per MOUs and the BLM's stated mission: "To sustain the health, diversity, and productivity of the public land for the use and enjoyment of present and future generations.	See response to comment 69-8. Upon re-classification of adjacent lands, BLM can consider changing decisions made in this document through plan amendment or revision BLM Manual H-1601-1, section 7 and Chapter I, Table 1.2 step 9).

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69-10	However, maps depicting the magnetic signatures of underground minerals within the Nushagak River watershed were presented by Billy Johnson at December 2006's Alaska Board of Fish meetings in Dillingham, Alaska, and are attached to this report. Slides 7-10 of Mr. Johnson's presentation shows underground minerals located west and east of the communities of Ekwok, New Stuyahok, and Koliganek. These subsurface minerals appear to be located below unencumbered BLM lands, yet they are not shown on Figure 3.80. Also, the magnetic signatures of these minerals appear to be the same (or similar to) the subsurface minerals located at the Pebble deposit (Slide 6).	See response to comments 55-8 and 55-11. Also, refer to Chapter IV, section E.2.a, which shows other exploration activities within the Bay planning area.
69-11	We are very concerned that BLM's locatable mineral potential/occurrence map (Figure 3.80) does not depict the subsurface minerals shown in Mr. William's magnetic signature graphics, and located below BLM lands. Therefore, we have sincere doubts about the accuracy of Figure 3.80, BLM's analysis of mineral potential on these lands, and BLM's assertion that the likelihood of mineral development on BLM lands in the Bristol Bay watershed is low. We request that BLM conduct a re-evaluation of mineral potential and occurrence on the Bristol Bay lands, particularly in the vicinity of New Stuyahok, Ekwok, and Koliganek, and revise Figure 3.80, as well as all related references in the RMP/EIS, to clarify that subsurface minerals are present below BLM-managed lands and that potential for their development does indeed exist if current withdrawals are revoked and the BLM lands made available for exploration and development.	See response to comments 55-8 and 55-11. Also, refer to Chapter IV, section E.2.a, which shows other exploration activities within the Bay planning area.
69-21	It is apparent from Figure 3.80 that little to locatable mineral potential exists on BLM-managed lands within the Bristol Bay watershed. Although BLM claims that mineral development on these lands would be unlikely, we find that there is insufficient information presented within the draft RMP/EIS to justify Alternative D's proposed management change which would open these currently closed lands to mineral development.	See response to comment 15-1.
5-21	Page 2-89, Summary table Fluid leasable Minerals Alternative B, Areas Open to Fluid Mineral Leasing Subject to Standard Lease Terms. We recommend removing the paragraph in alternative B referring to "Existing withdrawals of 3,999 acres would remain w/drawn from fluid mineral leasing." from this section. This information is covered in the section that describes areas Closed to Fluid Mineral leasing and the duplication is confusing.	Your suggestion has been incorporated into Table 2.13 within the FEIS.

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5-34	Page 4-86, Effects to Leasable Minerals for Alternative A The premise in the concluding sentence that if no oil and gas exploration and/or development occurs, the resources are unavailable to future generations seems illogical. The resources would in fact remain in the ground, unused, and be available for future development and use. However, they would not be available for consumption in the interim.	Your suggestion has been incorporated within the FEIS.
5-35	Page 4-86, Effects to Leasable Minerals for Alternative C. Please review the first sentence and confirm or correct the number of acres and corresponding percentage of acres where withdrawals would be maintained.	Your suggestion has been incorporated into the plan. Many tables and text referring to acreages have been changed within the FEIS to account for land conveyance and alterations in special designations.
69-1	As a reasonably foreseeable future action, Pebble Mine would dramatically and permanently affect all of the lands, resources and people of Southwestern Alaska. Therefore, we believe that it is extremely poor timing for the BLM Bay plan to introduce its Alt. D recommendation to open yet another million acres of public lands in this threatened watershed to hard rock mining, and oil and gas leasing.	Thank you for your comment.
27-1	Your plan does a good job of describing many of the negative impacts that are certain to come with mineral development. However, it does a poor job of explaining how those impacts will be avoided, and in many cases states clearly that they will occur.	ROPs, stipulations, and standard lease terms have been developed and will be used to meet the goals and objectives of the Alaska Statewide Land Health Standards and to prevent undue or unnecessary degradation as identified within 43 CFR 3809.2-2. Impacts will also be mitigated through project-specific environmental analysis and in accordance with the provisions of 43 CFR 3715. In addition, please see response to comment 4-3.

Subsistence/Social and Economic Conditions

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1-8	Increased oil, gas, and mineral development is likely to result in increases in numbers of both permanent and short-term residents in the planning area. Need an analytical plan of expected population growth and impact for each alternative. The Red Dog Mine is another good model to use for illustrating potential economic benefits to a region. Additional information could be incorporated in this section. The 2005 PILT to the Northwest Arctic Borough increased to $6.3 million (from $5.9 million in 2004). In addition to this payment, the Red Dog Mine paid $10.9 million in net smelter return royalties to the NANA Corp. in 2004. Of this 5.9 million was redistributed to the 11 other native regional corporations as part of its 7(i) payment (McDowell update of the preceding report, January 2007). These facts should be included to illustrate how mineral development can benefit local residents. The McDowell report also points out that the mining industry has a relatively high Alaska resident hire rate (82.3% in 2004) when compared to other key Alaska industries such as oil and gas (72.6%) and seafood processing (27.4%).	A general discussion of employment related to mineral development in Alaska and percentage of regional hire is presented in Chapter III section E.2.d. Chapter IV, section B.5 projects potential employment related to anticipated mineral development, by Alternative.
5-28	Page 4-10, Recreation 1st bullet: We request the Bureau revise the text in this bullet and elsewhere in the document from "sport hunting" to just "hunting." The State subsistence law currently includes all residents as subsistence users in areas where State regulation authorizes subsistence uses. Federal agencies frequently mischaracterize hunters who are not federally qualified subsistence users to be "sport hunters". Non-federally qualified subsistence users often qualify as subsistence users under the State regulations. It is also important to clarify that State regulations only classify hunters as being "resident" or "non-resident" hunters. The State no longer authorizes "sport hunting."	The term "sport hunting" has been replaced with hunting in the Bay RMP.
46-4	That Bureau of Land Management/Bay Resource designate Jack Smith Bay, Carter Spit Area, Snow Gulch Area, as Subsistence Use Areas.	BLM develops its management plans under the authority of FLPMA, 43 CFR 1610 and other regulations. These implementing authorities do not provide a means to identify the "subsistence use only areas" proposed. The primary means BLM uses to identify a special area while it is planning is to designate it an Area of Environmental Concern (ACEC). Please refer to Chapter I, section E.2.k and Chapter II, section C.3.

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1-5	Mineral development throughout the planning area has the potential to negatively impact the Mulchatna caribou herd.	If proposals for mineral development are received by BLM, site specific impacts to caribou would be analyzed under NEPA. The ROPs and Stipulations (Appendix A) would apply as appropriate to protect the Mulchatna caribou herd. Impacts to caribou and other wildlife species are discussed throughout Chapter IV.
1-26	Page 3-311, Table 3.42: This table presents subsistence harvest data derived from the ADF&G Division of Subsistence computerized database, which is now the Community Subsistence Information System (CSIS), and indicates that data are not available for Togiak and Twin Hills. Subsistence harvest data for these two communities are in the CSIS and in the following report: Both the CSIS and this technical paper can be accessed on the Division of Subsistence website. Additionally, updated subsistence harvest data from the following communities appears in Division of Subsistence Technical Paper 302, which will soon be published: Illiamna, Newhalen, Nondalton, Pedro Bay, and Port Alsworth. These data can be obtained from the Division of Subsistence office in Anchorage.	The information presented in the recommended database does not provide the same information presented in Table 3.40. The web site has been added to the Table informing the reader that supplemental data is available. Please see Table 3.40 in the FEIS.
5-42	*Appendix* B: ANILCA Section 810 Analysis of Subsistence Impacts Page B-5, 4th full paragraph: We recommend replacing the first sentence with the following language: "The current amount necessary for subsistence (ANS) determination made by the Alaska Board of Game for moose in Game Management Units (GMUs) in the planning area ranges between 280-390 moose annually." The authors suggest that this ANS determination seems low given the "significant increase in the distribution and population of moose in GMU 17A" and low caribou harvests due to a decline in the Mulchatna Caribou Herd. While it is possible that the ANS findings may need to be revisited, a growth in the moose population resulting in an increasing moose harvest does not necessarily mean that the ANS is inaccurate.	Your suggestion has been incorporated into Appendix D of the Bay FEIS.
5-43	Page B-5, final paragraph: We suggest replacing the first sentence with the following language: "The current amount necessary for subsistence determination made by the Alaska Board of Game for caribou in the GMUs in the Bay planning area (5 AAC 99.025) ranges between 3,600 and 4,800 per year." The final sentence in this paragraph estimates the unreported harvest of caribou in this area to be between 3,200 and 7,200 caribou annually, but does not indicate the source(s) of information used for this estimate. The source(s) of this unreported harvest estimate should be cited.	Your suggestion has been incorporated into Appendix D of the Bay FEIS.

Letter-Comment#	Comment	Response
12-1	Our people depend on the renewable fishery resources. A disruption of this symbiotic relationship would not only spell the eventual demise of the salmon, moose, caribou, bears and other wild animals of the region, but would also leased to the eventual death of the culture of our region. Our people have depended on the subsistence resources of this region for thousands of years. If our food source is driven away or exterminated by pollution, an influx of workers, and loss of habitat, the subsistence lifestyle the Bristol Bay native culture will be dealt a devastating blow.	BLM is required by Title VIII of ANILCA to be mindful of the impacts of proposed actions on subsistence uses. Utilizing NEPA, every Federal action in Alaska is subjected to a subsistence analysis and impacts on the Native community are analyzed under the concept of Environmental Justice.
13-1	Our people depend on the renewable fishery resources. A disruption of this symbiotic relationship would not only spell the eventual demise of the salmon, moose, caribou, bears and other wild animals of the region, but would also lead to the eventual death of the culture of our region. Our people have depended on the subsistence resources of this region for thousands of years. If our food source is driven away or exterminated by pollution, an influx of workers, and loss of habitat, the subsistence lifestyle the Bristol Bay native culture will be dealt a devastating blow.	Please see response to comment 12-1.
56-4	Alt. D is deficient in ensuring protections for streams and wildlife habitat within the planning area. Projected impacts to soil, water, and vegetation due to losable, locatable, and salable mineral materials would be virtually the same as under Alt b. with the exception of the Carter spit ACEC, where more vigorous operating procedures would be in effect, at least seasonably, On close examination of the various alternative details, it is apparent that the difference between potential effects due to mineral development for Alt B, which facilitates maximum resource development, and D is negligible. This suggest that Alt D., which is virtually the same as B with regards to mineral development could adversely affect subsistence activities over time, and so effectively degrade subsistence lifestyles in the future.	Please see reference to Alaska Land Health Standards, goals for Vegetation, Wetland, and Riparian Habitat and Soil, Air, and Water in Chapter II and ROPs, Stipulations, and Standard Lease Terms in Appendix A. Alternative D also incorporates the designation of a Carter Spit ACEC and 300-foot setbacks to specific rivers within the Bay planning area as described in Alternative C, incorporated into Alternative D. Chapter IV of the FEIS has been modified from that offered within the DEIS, providing an improved analysis of impacts associated with the proposed Alternatives. In addition, please see response to comment 12-1.
69-18	The Draft RMP/EIS provides a fairly detailed analysis of the subsistence patterns of the 25 villages in the planning area. Unfortunately, the section of the Draft RMP/EIS that explained the direct and indirect effects on subsistence common to all alternatives was less detailed. It predicted that Alternative A may significantly restrict subsistence use and needs in the planning area. Draft RMP/EIS at B-6. Oddly, although Alternatives B, C and D would open more than 99 percent of the planning area to mining and oil and gas exploration, and development, BLM found that	Please see response to comment 12-1. In addition, Chapter IV within the FEIS has been improved from that offered within the DEIS, providing an improved analysis of impacts associated with the proposed Alternatives. Your concerns were used during the reassessment of Chapter IV for the FEIS.

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	these activities would not significantly restrict subsistence use in or near the planning area, and even that most of the impacts would be negligible, given the management parameters BLM proposed. Id. at B-8, 10, 11. Unfortunately, we object to this conclusion and request that BLM conduct a more realistic analysis of the potential impacts to subsistence resources from the proposals to allow oil, gas, and hard-rock minerals development under Alternatives B, C and D.	
69-19	To comply with its ANILCA mandates and to allow informed decision-making and public participation, BLM must discuss in further detail how its ROPs and Stipulations would adequately protect resource values, including subsistence, as well as its plans for incorporating and enforcing any additional enhanced Bristol Bay habitat conservation standards, as introduced by the Alaska Board of Fish and/or Alaska Legislature. Perhaps the most striking flaw in BLM's logic is that for Alternatives B, C, and D, BLM identifies the other alternatives that would reduce or eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes as being Alternatives B, C, and D. Since each of these alternatives proposes a nearly identical level of oil, gas and mining development, BLM would be hard pressed to show that one provides any more protection for subsistence resources than another. We believe that this represents yet another failure in the agency's obligation to provide a full range of alternatives in the RMP/EIS.	Please refer to Appendix A and Introduction sections 1-3. ROPs and Stipulation are developed and attached to permits or leases for protection of targeted resources while utilizing another. In addition, Chapter IV of the FEIS has been improved from that offered within the DEIS, providing an improved analysis of impacts associated with the proposed Alternatives. Also, see response to comment 56-2.
71-1	…BLM should use the findings under ANILCA's 8.a. I believe it was for subsistence to make subsistence their priority when it comes to deciding what permits should be given out to whom and to where, that subsistence uses should be considered number one in all determinations.	Your comment refers to ANILCA, section 802(2), which states "nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive uses of all such resources on the public lands of Alaska when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population, the taking of such population for nonwasteful subsistence uses shall be given preference on the public lands over other consumptive uses." BLM will continue to administer the Federal subsistence program in the Bay planning area consistent with ANILCA, as described in Chapter II of the FEIS, in section D.4.b.

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5-38	Page 4-117, Irreversible and Irretrievable Commitment of Resources, Minerals. There is a concern that the statement under locatable minerals that "extraction may produce a short-term positive impact to a few residents of the region by providing them with a cash income" is an understatement of the overall benefits of mineral development. Although the development of a specific small mineral deposit (the extent of anticipated development on BLM lands) would be short-lived, it would contribute to the creation of job skills, additional investment in mineral development and contribute to the economy of the State, all of which have longer-term benefits.	Please refer to Chapter IV, sections E.4.b. and E.4.f.
17-1	Even if the mining operations exercise reasonable care, the probability of contaminants reaching the many streams and rivers of the affected area is quite high. The risk isn't worth it. The economic cost to the state in lost revenue from sport fishermen would be catastrophic.	Please see response to comments 15-1 and 4-3. Effects from locatable mineral development on water quality and fisheries are addressed in Chapter IV, sections C.3 and C.4 and cumulative effects in Chapter IV, sections E.3.a and E.3.c will be expanded to include a discussion of the current Pebble Mine proposal.
31-2	The BLM also makes the assumption that the potential job opportunities will allow local native people to become employed. The facts do not support this assumption. As our Governor has recently pointed out, our rural unemployment was 80% prior to the pipeline and associated North Slope industry came to our state. Today, some 30 years later, our rural unemployment rate is still at 80%. The conclusion could be argued that the rural residents and the culture in which they have been raised for thousands of years are not compatible with what would be considered normal employment by other cultures. It further could be argued that since subsistence opportunities would be taken from the rural people in the region that the negative affects on mineral development will have a dramatic negative affect on the rural population.	The analysis presented in Chapter IV has been modified compared to that presented in the DEIS. Please see Chapter IV, section D.8.c.1, this analysis anticipates 15% of workers coming from the local area, based on comparisons drawn from the North Slope oil industry. Please see response to comment 12-1.
39-1	Consider these lands as subsistence use areas only	As a multiple use agency, BLM has considered a mix of resource uses in the Draft RMP/EIS. BLM develops its management plans under the authority of FLPMA, 43 CFR 1610 and other regulations. These implementing authorities do not provide a means to identify the "subsistence use only areas" proposed.
39-3	Identify: an over view of study finding of harvest and uses of caribou, moose, bear, and Dall sheep, subsistence fisheries of Bristol Bay Management Area, and a summary of Bristol Bay sockeye salmon harvests (Para)	Please refer to Chapter III, section B.6 and Table 3.40 for an overview of wildlife and subsistence values.
41-1	designate these Federal Lands adjacent to Native corporation lands in the Bristol Bay region as Subsistence Use Only Areas	Please see response to comment 46-4.

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44-1	Although our people need employment, they choose only be employed so they can maintain their subsistence way of life. If any jobs were created from the development of the lands that are adjacent to our lands, a vast majority of these jobs would be taken by non-watershed residents. The influx of people would also add competition to our subsistence way of life, greatly affecting our traditional way of life.	Please see response to comment 12-1.
52-1	Much of Alaska suffers from a depressed economy and this mineral-rich area has potential to improve dramatically the local economy by adding high-value jobs and tax revenue. Additional ACECs and other restrictions that have potential to affect adversely mineral development will exacerbate economic problems. There are few alternatives locally to such a high-value industry, and few areas are fortunate enough to possess such mineral wealth as found at the Pebble deposit. Other rich deposits likely exist undiscovered, providing long-term economic benefits to the region.	43 CFR 1610.7-2 requires that areas having potential for ACEC designation be identified and considered throughout the resource management planning process (Appendix B). Proposed mineral activities in the ACEC, as well as all other areas within the Bay planning area, would be subject to Required Operating Procedures and stipulations specifically designed to protect the resource values identified.
53-1	A decline in the Bristol Bay fishery, will result in a loss of recreation related income to a broad section of the economy that will surly surpass the narrow benefits accrued through the interests of the extraction industries.	Please see response to comment 15-1. The effects analysis presented in Chapter IV of the Draft RMP/EIS describes anticipated impacts to resources resulting permitted activities on BLM managed lands, including aquatic habitats (section C.4) and economic condition (section D.8).
54-1	When it comes down to economics, fish always get the least consideration. In Montana, the mining track record is abominable and the continued impact on a couple rivers is everlasting. I can't see that it would be any different in Alaska. At risk is a salmon fishery that would continue to generate income forever if not destroyed by the one-time extractive effort of a major gold mine. We have effectively lost the salmon of the lower 48 because of short sighted management. Now that we have the benefit of hindsight, it is even more mindboggling that a similar proposal is being made for Alaska. With six billion people on the planet, the need to eat will eventually outweigh our need for gold, and still that consideration seems to be conveniently ignored by the short term money interests willing to sacrifice a major existing economic treasure for short term boom.	Please see response to comments 15-1 and 53-1.
55-19	Pg. 3-299, 1st paragraph. We disagree with the statement. "These industries," (re: mining, oil, and gas) "which may be expanding presence in southwest Alaska, are likely to provide jobs to Alaskan, however, they will be primary out of region residents." The evidence does not support this statement and the very opposite is	Please see response to comment 31-2.

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	true and the correct facts should be included in the RMP/EIS. Mining companies currently working in remote areas of Alaska such as at Donlin Creek and Pebble have implemented local hire policies that have resulted in training and hiring local residents from many of the communities in western and southwestern Alaska. Bill Bieber, Donlin Creek project at the Alaska Miners Association's Convention in November 2006. Barrick and NovaGold, working closely with Calista Corp., and a workforce that was mostly local. Donlin Creek Employment in 2006 included 350 Calista shareholders which was 86%of total workers on the project site. A total of 23 villages represented in the workforce. Over the past 11 years local shareholders have worked at the project and many are now supervisors and managers of the work on site. Northern Dynasty is doing the same and in 2006 15 villages from Southwest Alaska were represented in the workforce at the Pebble exploration project. The Red Dog Mine is another good model to use for illustrating potential economic benefits to a region. Additional information could be incorporated in this section. The 2005 PILT to the Northwest Arctic Borough increased to $6.3 million (from $5.9 million in 2004). In addition to this payment, the Red Dog Mine paid $10.9 million in net smelter return royalties to the NANA Corporation in 2004. Of this 5.9 million was redistributed to the 11 other native regional corporations as part of its 7(i) payment (McDowell Group, An Economic Impact Profile of Alaska's Mining Industry, January 2006). The 2005 royalty payment was $17million with a redistributed 7 (i) payment of $9.9 million (McDowell update of the preceding report, January, 2007). These facts should be included to illustrate how mineral development can benefit local residents.	
60-10	Pg 3-200…the Bristol Bay region support world class sport fishing and sport hunting opportunities found no where else… This coupled with other forms of eco-tourism in the region contribute tens of millions of dollars annually to the local, regional, state, and national economies. Until these facts are incorporated into the Draft RMP/EIS, it will remain a legally deficient document.	Please refer to Chapter III, section C.4. Recreation and Tourism in the Bay planning area is recognized in Chapter III but it doesn't necessarily occur on BLM-managed lands. Chapter III, section C.4.b describes that only four SRPs are currently issued by the Anchorage Field Office.

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60-11	Pg. 3-289-Discussion of the draft Bristol Bay ACEC similarly understates the value of the renewable resources and how these support a sustainable local economy based primarily on commercial, recreational, and subsistence fishing. Failure to spell out….the existing reliance on these resources prevent BLM from engaging in a reasonable assessment if impacts on the present economy.	Please see response to comments 4-1, 15-1, 60-10, 69-9, and Chapter III, section E.2.
62-1	…While BLM alternatives except A encourage exploration and development, it would come at a cost to taxpayers with small to non-existent chance for a return. In contrast, the sport and subsistence economies that could be upset by exploration and development have a proven value that does not cost the taxpayers.	See response to comment 15-1 and 69-5.
69-12	Finally, we request that BLM consider The Economics of Wild Salmon Watersheds, Bristol Bay, Alaska (Duffield, et al. 2006) an economic study by the University of Montana and the University of Alaska (ISER). This study quantifies the economic production from the Bristol Bay watershed for commercial, subsistence and recreational use. It can be located at: http://www.iser.uaa.alaska.edu/Publications/sg_bb0706.pdf	The Bay RMP/EIS acknowledges the importance of salmon in the regional economy of the area in terms of total value (Chapter III section B.6.b), the main industry in the area (Chapter III, section E.2.a), and source of local employment (Chapter III, section E.2.d).
63-1	…This region is the world's largest supplier of wild salmon, employing thousands of workers and generating close to $300 million of revenue annually, through commercial fisheries...Thousands of people travel to and recreate in the Bristol Bay region…most coming for the fishing. These sportspersons deliver another $61 million of revenue annually. Why risk the renewable resources of this region and the habitats ...to support mineral development which will benefit ...few people for a..short time.	Please see response to comments 69-5 and 69-12.
70-1	It would be beneficial if the plan would reflect the current data that's out there presently, the current impact that salmon has on the area, like the [Institute for Social and Economic Research] ISER [UAA] research information.	Please see response to comment 69-12.
70-4	... the comment about the [Institute for Social and Economic Research] ISER [UAA] study that values our resource at $175 million a year in terms of commercial value needs to be reflected in the plan.	Please see response to comment 69-12.

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3-7	The principles of Environmental Justice (EJ) should not be assumed to be applicable to Native populations alone. Currently there is no socioeconomic information in the document that supports that these populations are one in the same. Additionally, there is no clear analysis of potential impacts to low income and minority populations to reach the conclusion that they will not be disproportionately impacted. Such an analysis should be undertaken and incorporated into the Final EIS.	Within the FEIS the Environmental Justice section has been modified compared to that presented within the DEIS. Your comment was considered.
18-1	Many tribes still do use only natural teas and uses other's to cure our sick. I know and use those myself. Destruction of our lands by invading predator industries will forever remove growing fields and swamp land where much of our natural plants grow.	See response to comment 12-1.
69-20	If non-local hunters are given unlimited access to the wildlife and fish resources in the planning area, to the detriment of local use of the same resources, then the plan has had a disproportionate effect on the local community. BLM should evaluate possible effects on the local communities' use of resources not only for compliance with ANILCA, but also as part of its mandate to consider environmental justice.	Changes in hunting and fishing regulations are controlled by the Boards of Game and Fish and the Federal Subsistence Board and are beyond the scope of this plan. Additionally, the State of Alaska's administration of guides, outfitters, and transporters is beyond the scope of this plan (Chapter I, section E.2.c). Currently, the BLM Anchorage Field Office issues four SRPs for big game guides in the Bay planning area (Chapter III, section C.4.b).
69-45	The disruption of subsistence activities by climate change suggests that land managers should approach other activities that impact subsistence with caution. Regardless of the choices managers make, the Bay management plan must recognize the disruption of subsistence activities in the region and incorporate those impacts into its planning efforts. (Arctic Climate Impact Assessment. 2004. Hinzman, et. al. 2005.), (Callaway, Don. 1999. Effects of Climate Change on Subsistence Communities in Alaska), (Callaway. 1999. p 19; Hinzman, et. al. 2005. p 282.)	The Draft RMP/EIS discusses climate change within the region and considers expected trends (Chapter III, section B.1.b). These expected trends are taken into account in assumptions used in Chapter IV. Please see response to comments 22-1, 69-37, 69-39, and 69-40.
58-3	The Bay planning area is depressed economically and would benefit from diversification through the development of employment and a local tax base provided new mines.	See response to comment 52-1.

Recreation

Letter-Comment#	Comment	Response
5-31	Page 4-45, Effects to Wildlife from Recreation Management (Common to all) It is not clear whether "enhanced or excessive harvest" is referring to more game being legally taken, which does not constitute an impact, or taking game beyond what is legally allowed, which constitutes an impact from illegal activity, which would more appropriately be categorized as an enforcement issue. The State Board of Game and ADF&G regularly monitor harvested populations to insure against "excessive harvest"	The ADFG is responsible for managing game populations and allocating harvest allotments. This reference to enhanced or excessive harvests has been removed from the FEIS.
5-22	Page 3-197, ROS Class Setting: It may be helpful to include common examples for both Semi-primitive non-motorized and Primitive as well as the Semi-Primitive Motorized	Comments to the Bay DEIS came from other U.S. states and a few from other countries. Unfortunately, examples of ROS classifications may not necessarily be common. BLM believes the descriptions in Chapter II provide an adequate understanding of ROS classifications.
69-50	Wilderness is a multiple use under the Federal Land Policy and Management Act of 1976 (43 U.S.C. § 1701(a)(8), 1702(c)). It is imperative at this point in the planning process for BLM to ascertain the resource values on the public lands in Southwestern Alaska, and one of those resources must include wilderness quality before the Draft Bay RMP/EIS is finalized.	The Federal Land Policy Management Act (FLPMA) directs BLM to manage lands for a variety of resource values under a multiple use mandate. See 43 U.S.C. 1701 and 1702. Under FLPMA, BLM has discretion in determining which resource values it considers and how it will manage those resources through the land use planning process. Although “wilderness” is not explicitly included as a multiple use resource value in FLPMA, BLM has the discretion to consider whether lands within a planning area have wilderness characteristics. In the Bay planning area, there are no Congressionally-designated Wilderness Areas or Wilderness Study areas, and BLM has not ascertained the extent to which lands with wilderness characteristics exist, they are addressed in Chapter III, section C.4. “Recreation Management.”
60-3	Page 2-5 -Rejection of Special Recreation Management Areas (SMRA's) is an arbitrary and capricious action given the enormous recreation values associated with the renewable fish and wildlife resources of the Bristol Bay region. In multiple other instances, the RMP notes the outstanding recreational values in the region yet the document flatly rejects any SRMA designations.	Chapter II, section C.2 states: "BLM Anchorage Field Office (AFO) considered SRMA status for each block of BLM unencumbered land within the Bay planning area. However, the use patterns and types of recreation opportunities to justify SRMA status were not found." Please see Appendix C.

Travel Management

Letter-Comment#	Comment	Response
5-23	Page 3-201, Travel Management. We appreciate the inclusion of a source citation for language in the R.S. 2477 and 17(b) Easement sections (page 3-201).	43 CFR §1864, has been added to the citation concerning R.S. 2477 routes in Chapter III, section C.5.b.1.
5-29	Page 4-11, Travel Management, Bullets 2 and 4. The second bullet mentions increases in OHV technology allowing off-road users to access previously inaccessible parcels. It may also be worth noting that increases in available technology can also contribute to reductions in potential resource impairment. Please review the fourth bullet and clarify BLM's intent with this assumption. We understand that BLM is required to designate areas as open, limited or closed to OHV use and have found the limited designation to be consistent with the State's Generally Allowed Uses. However, the second sentence in this bullet to mean that use is being restricted to a specific type of user. Since the plan does not introduce various "classes" of OHV users in the document and there are no restrictions in the plan that limit OHV use by user type, we recommend BLM revise the bullet to reflect actual intent.	Information pertaining to increased technology reducing potential resource impairment is noted, none the less, a GVWR of 2,000 lbs. will be used as the threshold for OHV limits. These bullets are embedded within the Resource Assumptions section of this document. Bullet four merely states existing trails on BLM lands are classified as limited and use for subsistence hunting is allowed. Please note, OHV use for subsistence purposes is not recreation, especially considering the importance of subsistence resources to the people that live within this region. No data has been collected concerning the various type of OHV users.
33-2	If BLM considers other alternatives, I do not agree with the use an absolute maximum weight for OHV as a limit, a "pounds per square inch (PSI) of footprint" on the ground should be used. The idea is to limit degradation of the ground from OHV use. Please don't limit industry and others from using an new technology, or idea, developed now or in the future that may allow a vehicle which is heavier than 2000 lbs have less impact than lighter vehicles with out such technological advances.	The 2,000-lb GVWR weight limit allows continued access by commonly used OHVs loaded to manufacturer's maximum loads and prevent undue and unnecessary degradation of BLM-managed lands. Common vehicles frequently operating on trails within the Bay planning area that weigh less than 2,000-lb GVWR include: three, four, and six wheel all-terrain vehicles and amphibious six-to-eight wheel Argos. In addition, a vehicle weight limit is easier to inspect since the GVWR is normally affixed to a vehicle or is easily obtained from the manufacturer.
35-1	Rather than use an absolute maximum weight for OHV as a limit, BLM should consider a "pounds per square foot (psi) of foot" on the ground. The intent is to limit degradation of the ground from OHV use. Don't limit the creative minds from using technology or creativity to utilize something with minimal ground degradation but is heavier than 2,000 lbs.	Please see response to comment 33-2.
66-1	Rather than use an absolute maximum weight for OHV as a limit, BLM should consider a "pounds per square foot (psi) of foot" on the ground. The intent is to limit degradation of the ground from OHV use. Don't limit the creative minds from using technology	Please see response to comment 33-2.

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65-1	..in the Bay RMP draft the definition of "Limited" is also limiting gross vehicle weight ratings to 2000 lbs. on unencumbered lands, and 1500 lbs. on encumbered BLM managed lands. While the Alaska Administrative Code AAC 96.025, ..states recreational-type vehicles up to 1500 lbs., may be used, it also allows for the use of highway vehicles with a curb weight of up to 10,000 lbs consistent with the State's "Generally Allowed Uses"...we request the all-terrain vehicle weight limit to be 2,000 lbs. for all lands, to avoid confusion for users traveling across encumbered and unencumbered lands.	Please refer to Chapter II, section D.2.e.3. The 2,000-lb GVWR weight limit will be applied for all BLM-managed lands within the Bay planning area. This will provide a greater level of consistency for both users and enforcement until conveyance of selected lands.
47-1	We believe the emphasis on resource development will result in substantial increases in OHV use, regardless of the suitability of the terrain, and consequent environmental damage.	Alternative D designates "Limited" for OHV use on all BLM-managed lands within the Bay planning area. The restrictions applied to OHV travel will prevent undue or unnecessary impacts to resources, especially in areas of moderate to high use. In addition, ROPs (Appendix A) will be applied to all permitted activities to maintain desired conditions established in BLM Alaska Land Health Standards (Appendix A).
47-2	We do not believe that using the state's " Generally Allowed Uses" policy to guide BLM, will result in significant regulation of OHVs unless and until trails are identified and marked and there is routine, systematic and very public enforcement in place	Please see response to comment 65-1. A Comprehensive Trails and Travel Management (CTTM) plan, which will be produced within five years of plan approval (BLM manual H-1601-1, Appendix C, page 17) will include further public involvement and recommendations for individual roads and trails within the Bay planning Area.
56-1	We also suggest amending Alt A to address increases in OHV use and the potential for gravel mining in active stream channels. By incorporating more rigorous ROPs for the planning area under Alt A, damage from possible gravel mining could be minimized, and limited restrictions on OHVs will prevent damage to important fish habitat.	Alternative A is the no action alternative which suggests a continuation of current management practices (Chapter II, section B.1). it is assumed that there would not be an increase in gravel mining on BLM lands since current gravel mining operations within the Bay planning area are located on private lands near population centers (Chapter IV, section B.3.c.3). ROPs (Appendix A) will be applied to all future permitted activities and additional mitigation measures will be identified in a project-specific NEPA analysis, further preventing impacts to fish habitat. Impacts to aquatic habitat are discussed in Chapter IV.
22-11	Determine how access will be provided to BLM managed lands for various purposes, including, aircraft access to BLM Lands. Are you addressing aircraft access to BLM lands. Please explain. Who and how is this regulated?	Current condition travel management for the Bay planning area, including Air Routes and Air Strips (Chapter III, section C.5.b.2). Authorized landings on BLM-managed lands are regulated through special recreation permit (SRP) process. Unfortunately, due to the remote location of most BLM managed lands within the Bay planning area and the lack of human resources, many unauthorized landings go undetected.

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5-24	Page 3-211, OHVs 5th full paragraph. This paragraph inappropriately combines Sections 811 and 1110(a) of the Alaska National Interest Lands Conservation Act (ANILCA, P.L. 96-487) which may confuse the reader trying to determine which provisions apply to Bureau lands. It is important that the Bureau develop the plan in accordance with the appropriate ANILCA provisions for Conservation System Units where applicable and on all public lands in Alaska. Section 811 of ANILCA states that: "the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation..." (emphasis is added) ANILCA Section 1110(a) mandates that: "... the Secretary shall permit, on conservation system units, national recreation areas and national conservation areas, and those public lands designated as wilderness study, the use of snowmachines (during periods of adequate snow cover...), motorboats, airplanes, and non-motorized surface transportation methods for traditional activities...and for travel to and from villages or homesites. Such use shall be subject to reasonable regulations by the Secretary to protect the natural and other values of the conservation system units... and shall not be prohibited unless, after notice and hearing in the vicinity of the affected unit or area, the Secretary finds that such use is detrimental to the resource values of the unit or area." (emphasis added) We recommend the Bureau cite these provisions separately to avoid confusion.	These changes have been made within the FEIS. Please see Chapter III, section C.5.c.

Renewable Energy

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3-17	Page 2-43 Since hydropower (Tazimina Hydroelectric Plant) and other renewable and alternative power projects do exist in the planning area, BLM, in concert with local communities, should closely examine whether areas for renewable energy facilities should be identified. As information is collected on this subject, it may be used to enhance the energy supply description on p. 1-6.	Please refer to Chapter III, section C.6: Renewable Energy. There is currently no demand for renewable resources on unencumbered BLM lands in the Bay planning area, but BLM will consider proposed actions on a case-by-case basis. Practical economics suggest that renewable and alternative energy facilities be constructed near population centers. BLM-managed

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		lands are located a considerable distance from most population centers, making development of these facilities unlikely within the life of the plan.
69-48	In 2003, the Alaska Energy Authority, with the assistance of Department of Energy (DOE) and its contractors, completed an assessment of geothermal resources in Alaska. That assessment followed up on work performed in the 1980s. It identified two geothermal sites that have a high potential for development as energy sources.	Information within the Mineral Occurrence Report for leasable minerals pertaining to geothermal resources in the planning area has been added to the FEIS, Chapter III, section C.3.a.1.

Lands and Realty

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5-13	Page 2-49, (6) Alternative D, also affecting (5) Alternative C, Table 2.11 & 2-52, 2nd bullet and Table 2.15, page 2-110. The Bristol Bay Area Plan for State Lands (BBAP, 2005) contains a map on page 2-37 that illustrates the abundance of mineral resources that lie to both the east and south of the proposed Carter Spit ACEC. By categorizing the ACEC as an avoidance area for Land Use Authorizations, opportunities for mineral resource development on lands containing these prospects would be unduly hindered primarily by affecting access. We request elaboration on what is meant by the term "avoidance area." We appreciate new language that was applied in Chapter IV (pages 4-79 and 4-80) subsequent to our previous comments, but request additional clarification that access proposals will be considered within the ACEC context and not entirely excluded.	Within the FEIS, the boundary of the Carter Spit ACEC has been altered, in Alternative D, from that proposed within the DEIS (Maps 2.32 and 2.33). Avoidance area is explained in BLM handbook H-1601-1. This designation provides for right-of-way “under special stipulations.” Please refer to Appendix B. The Carter Spit ACEC is proposed to provide additional protection to federally-listed migratory bird species.
5-14	We also request that Table 2.15 on Page 2-110, Alternative D, for Lands and Realty be changed so that it is consistent with Table 2.11. Table 2.15 currently states that no Land Use Authorizations will be considered in the Carter Spit ACEC area, whereas the intent and the previous Realty summary table indicate that the Carter Spit ACEC is an "avoidance area."	This suggestion has been incorporated within the FEIS.

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5-25	Page 3-213-3-287 Lands and Realty: We find the Lands and Realty section in Chapter III to be very well done, with an appropriate amount of detail to describe the withdrawal, easement, or permit and extensive mapping which is very helpful and well done. However, we suggest that in the final draft BLM review the location of maps relative to the corresponding text and perhaps make some adjustments to the location and titles of the included maps.	The maps are located within a separate volume for the FEIS and all maps are appropriately titled and in proper sequence.
5-30	Page 4-13, 5th full bullet, 2nd to last sub-bullet. We appreciate the additional information given to elaborate on this bullet. However, we still recommend using the analogous bulleted list given in Chapter II (pp. 48-49), which addresses this issue with the language "where landowners have made a request" instead of "where landowners support the activity allowed by the easement." This will avoid the impression that the preferences of the adjacent landowner in any way supersedes the intent of 17(b) easements, which is to maintain the right of access to public lands and waters. It will also resolve the need for the explanation in parentheses, while still addressing similar priority situations.	This suggestion will be incorporated within the FEIS. Please see Chapter IV, section B.3.g.
5-44	Appendix E. This appendix of 17b easements is very useful. Is it possible to provide a map depicting these easements in this section, or perhaps refer back to the maps in Chapter III that do depict these easements, or as an alternative, move the 17(b) maps to this section?	Maps depicting 17(b) easements are referenced in Chapter III of the FEIS. See response to comment 5-25.
28-1	Alternative B of the document will best accommodate future multiple use of the remaining lands within the planning area. At the same time we should recognize that over 40% of this planning area has already been set aside for State and Federal parks and other withdrawals. Keeping this in mind the proposed addition of ACEC's and VCM's to the planning area does not appear warranted nor in conformance with the No More clause specified in ANILCA.	Alternative D incorporates portions of both Alternatives B and C providing a mix of development and conservation objectives. Please refer to response to comment 58-2.
34-1	ANILCA states in part that " No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservations system unit, national recreation area, national conservation areas or for related or similar purposes shall be conducted unless authorized by this Act of Congress." Not only does your proposed action violate the provisions of ANILCA, it goes against the spirit of the law as well. There are currently 154 million acres of land that is set aside in one type of federal conservation unit or another.	Section 1326(b) of ANILCA is often referred to as the "no more" clause which states that no further studies for the single purpose of considering the establishment of CSU, national rec areas, etc shall be conducted. The RMP is a comprehensive planning document assessing various resource values and recommendations incorporate a combination and balance of diverse resource uses. The planning document adheres to BLM's multiple-use policy as mandated by FLPMA and strives for a combination of uses that will best meet present and future needs of the resource values.

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69-15	BLM has failed to conduct the Public Interest Analysis of d-1 withdrawals required by ANCSA. The clear message of Section 17(d)(1), the subsequent PLOs, and Section 207 of ALTAA is that the Secretary is required to identify the public values of the d-1 lands and to consider the public interest in these lands when making decisions about lifting withdrawals. In order to carry out this duty, the Secretary must conduct some sort of analysis of the withdrawn lands that identifies the public values of the various lands so that protective actions can then be taken as warranted. Unfortunately, this analysis is entirely missing from the draft Bay RMP, even though the RMP is the mechanism by which the Secretary proposes to eliminate virtually all of the d-1 withdrawals in this region. The draft RMP provides a description of the lands within the Bay planning area, in Chapter III, "Affected Environment," but it does not state which of the lands described are subject to d-1 withdrawals. The draft RMP also mentions studies and assessments of the d-1 withdrawals done in the 1980s, but it provides neither citations nor any detail about the results of these studies and assessments.1 RMP at 3-214. Most importantly, although the "Affected Environment" section strongly suggests that many lands within the RMP area possess wildlife, subsistence, and other public values that are worthy of continuing protection, the draft RMP fails to draw a connection between these values (and the public interest in them) and its proposal to lift virtually all of the d-1 withdrawals in the three action alternatives.	Chapter III describes resources of BLM-managed lands within the Bay planning area, including biological, physical, cultural, and mineral values. The impacts to these resources resulting form each Alternative (Chapter II) have been addressed within Chapter IV. Table 3.19 describes the various PLO and Map 3.37 shows BLM lands withdrawn under ANSCA 17(d)(1) by the various PLOs. In addition, ROPs, Stipulations, and Standard Lease Terms have been created through the planning process to protect Bay planning area resources. These ROPs, Stipulations, and Standard Lease Terms will be applied to all authorized activities occurring on unencumbered BLM lands on an as needed basis to protect resources as identified through project-specific NEPA processes.
69-47	The Draft RMP/EIS did not provide an adequate discussion of the potential for renewable energy within the planning area. If this plan is to serve for 10-20 years, it should include in its scope a discussion of renewable energy.	Chapter III, section C.6 provides a discussion of renewable energy. There has not been nor is there currently any proposed projects concerning renewable energy on BLM unencumbered lands within the Bay planning area. Chapter IV discusses the desire for communities in the Bay planning area to capture renewable energy resources but the proximity of BLM unencumbered lands does not support development of these facilities.
5-12	Page 2-45, (d) Recreation and Public Purposes (RP&P) Act Sales, 5th bullet If the land proposed for RP&P sale is first leased to the potential buyer pending the completion of construction, please clarify what would become of the lease income (i.e., placed in escrow for the buyer, subtracted from the purchase price, etc.). If retained by BLM, the financial burden of leasing in addition to construction and purchase may be excessive.	A reference to the BLM Handbook H-2740-1, Chapter VI Paragraph B has been added to Chapter II, section D.2.g.3.d. The monies are deposited in the General Fund. The monies paid are applied against the value of the leasehold (rent) and not the purchase price of the property. Rental rates range from 90% of rental value to a nominal amount of $2.00 an acre.

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37-3	Land sales often result in construction of hunting and fishing tourism facilities. Proliferation of these facilities had an impact on subsistence, and more facilities will mean more competition for resources. We prefer that if land is developed for this purpose, that it be done through leases, so that a much higher degree of control is maintained. BBNC fully supports land exchanges that benefit community infrastructure development.	FLPMA Sec. 102(a)(1) states that [BLM] lands will be retained unless disposal serves in the national interest. Impacts associated with any land disposal action will be assessed through NEPA analysis.
37-4	17B Easements: As tourism, fishing and hunting activity and resource development activities grow, there is greater incidence of trespass and greater potential for damage to BBNC lands. The draft RMP indicates that 17B easements will be defined and surveyed "as budget allows". BBNC thinks that BLM should assign a higher priority to resolution of 17B easements, survey them, mark them, and maintain them.	BLM understands the importance of identifying 17(b) easements. As budget and staffing allow, BLM may enters into cooperative arrangements with the dominant landowner to locate and mark these easements. The ability for this to occur greatly depends on staffing and financial resources.
57-1	BLM and the rest of the federal government should abide by the "No More" pledge of ANILCA: "No More" administrative or legislative set-asides of federal lands in Alaska. Alternative D, by heaping additional restrictions to resource development on BLM-managed lands, violates that promise.	See response to comment 34-1.
64-1	ANILCA Mandated that no new conservation areas would be created in Alaska, specifically to enable Alaska to sustain a growing economy for its citizens. The proposed ACEC and Level III VRM areas, as envisioned in Alternative D, violate the intent of ANILCA and should not be implemented	See response to comment 34-1.
68-1	BLM should honor the "no more" principle of ANILCA	See response to comment 34-1.
58-2	BLM should honor the "no more" principle of ANILCA	See response to comment 34-1.
58-1	BLM should honor the "no more" principle of ANILCA	See response to comment 34-1.
59-1	BLM should honor the "no more" principle of ANILCA	See response to comment 34-1.
33-1	It is also important to remember the ANILCA has a "No More" clause in it and should be honored.	See response to comment 34-1.
35-2	The spirit of the "No More" clause of ANILCA should be honored.	See response to comment 34-1.

Pebble Mine

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55-12	Pg. 3-191, Pebble Copper… This section is out of date. Updated info should be obtained and included in the Final RMP/EIS to accurately reflect the current level of knowledge in the region. This info. Can be found at www.ndmpebblemine.com.	New information concerning the proposed Pebble mine has been included within the FEIS. Please refer to Chapter I, section E.2.j.
16-1	There is a big gap in the draft RMP. It does little or nothing to stop the Pebble Mine project, a proposed open-pit gold and copper mine that would be the largest open pit in North America. Exploration drilling has been allowed in the Bristol Bay watershed for this mine, and Alaska residents are gravely concerned because the mine would use the cyanide heap-leaching process, potentially contaminating the clean waters of Bristol Bay. BLM should be taking steps against the mine to the full extent of your authority.	BLM has no jurisdiction concerning activities occurring on State lands.
19-1	There should be a special management designation for Bristol Bay that would recognize the threats posed by the proposed Pebble Mine, and apply protections to the area's fish and wildlife habitat.	BLM has proposed a range of alternatives from conservation to development in the Bay RMP, some of which address fish and wildlife habitat. See Chapter II. The alternatives include designations of Areas of Critical Environmental Concern (ACECs) that recognize and protect important resource values. Chapter IV, section E, analyzes the impacts upon BLM lands from development on adjacent lands including the proposed Pebble Mine on State land.
30-3	I recommend full consideration and analysis of the possibility of the development of a large scale open pit mine in the Pebble Mine project area. Northern Dynasty Mines has provided a wealth of information on their plans, including filing for water rights, consulting extensively with state and federal agencies, including BLM, conducting environmental baseline studies and publishing annual reports in 2004 and 2005. Northern Dynasty Mines has stated that it expects to file applications for operating permits in 2008. The Plan states that until applications are received, it cannot analyze the potential impacts from this mine in light of the alternatives considered here. I disagree with this, and urge you to fully consider the reasonably foreseeable impacts from that project as Northern Dynasty Mines has described so far. Their project, if approved, will unquestionable result in additional cumulative effects to the Bristol Bay region.	Impacts analysis from the proposed Pebble Mine can be found in Chapter IV, section E of the FEIS.
60-11	Pg.4-5…the document proceeds to understate…the effects of industrial development in the region. The Draft refers only to "potential impacts" from "infrastructure development". However,	ANSCA 17(d)(1) precluded mineral development within much of the Bay plan boundaries. Chapter IV analyzes "potential impacts" resulting from implementation of this plan in concert with

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	four pages later it outlines some of the development associated with the Pebble proposal including roads, bridges, power lines open pits, mills, tailing dams, employee housing, etc. A DEIS must do a better job of accurately depicting the consequences of industrialization on fish and wildlife resources and the present regional economy. Failure to provide such information misleads and misinforms the public and destroys the public's ability to participate meaningfully in the NEPA process.	the Reasonable Forseeable Development Scenarios. In addition, since the Pebble mine is currently a proposal, only potential impacts can be analyzed at this time. Please refer to Chapter IV, section B for assumptions and methods and Chapter IV, sections C, D, and E for impacts analysis.
60-14	Pg.4-103 - After listing three pages of perspective mining and related activities that may be triggered or facilitated by this RMP, the DEIS identifies only ONE cumulative impact arising from the Pebble proposal: "The exploration and planning phase of this project is likely to continue for several years and provides income for lodge and hotel owners in Illiamna as well as jobs for locals." Id. This "one" impact conclusion is demonstrably incorrect and utterly fails to satisfy NEPA requirements regarding the reasonable identification of cumulative impacts. 40 CFR 1508.25 (a)(2). Grand Canyon Trust v. FAA., 290 F.3d 339, 341 (D.C.Cir.2002); Found. of Econ. Trend v. Heckler, 756 F.2d 143, 159 (D.C.Cir. 1985).	Please refer to response to comment 60-11. The cumulative impacts analysis in Chapter IV of the FEIS has been revised to include a discussion of the latest Pebble mine proposal and how the reasonably foreseeable impacts of this proposal would cumulatively impact resources on BLM-managed lands.
60-15	Pg.4-108 - In the same vein, there is a failure to recognize the impacts of the extensive industrial infrastructure associated with the Pebble proposal as well as the other one to three mines predicted to occur as a result of adoption of Alt. D.	See response to comment 60-14.
69-1	According to the National Environmental Policy Act (NEPA), BLM is required to analyze the cumulative impacts of all “past, present, and reasonably foreseeable future actions”. We believe that BLM has failed to conduct an adequate analysis of the cumulative impacts the proposed Pebble Mine and reasonably foreseeable mining district on State of Alaska lands, as well as the potential cumulative impacts that may be caused by BLM’s own preference to make the Bay planning area’s public lands available to mineral development.	See response to comment 60-14.
60-8	Pg. 3-29.....BLM should be aware the Pebble mine proponent has filed with the State to withdraw 29 cfs from the upper reaches of the Upper Talarik Creek despite the fact that the Creek's median flow is only 27 cfs. This is precisely the kind of "discontinuity of river flow" that alarms RRC and all fisheries interested in Bristol Bay.	Thank you for your comment.

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10-1	The hard rock mining technique that would be employed by the proposed Pebble Mine uses cyanide and toxic chemicals that inevitably end up in the water supply. Even minute concentrations of these obvious poisons are fatal for the salmon and trout which spawn in the downstream BLM-managed rivers, not to mention other wildlife and people that consume the water.	Please see the response to comments 50-1 and 4-3.

Special Designations

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69-3	BLM's ACEC Manual explicitly recognizes mineral withdrawal as an appropriate management prescription for protecting ACEC values. BLM Manual No. 1613, Section .33.C (Provision for Special Management Attention). In general, we object to BLM's failure to include sufficiently strong management prescriptions, especially the revocation of ANCSA 17(d)(1) withdrawals, within proposed ACECs.	Please refer to BLM Manual No. 1613, Section 2.21.E. ANCSA 17(d)(1) withdrawals are in place under current management practices and will remain in place "until the area is fully evaluated through the RMP process". In addition to mineral withdrawal, BLM Manual No. 1613, Section 33.C (Provision for Special Management Attention) goes on to state that "establishing special stipulations to be attached to authorizing actions" or additional methods are also appropriate management prescription for protecting ACEC values.
3-18	Figures 2-9 and 2-10 should be associated with Alternative C, since Alternative C is the only alternative that includes WSR nomination.	Please see Maps 2.34 and 2.35 in the FEIS.
5-36	P. 4-92, Carter Spit ACEC & Bristol Bay ACEC/ pp. 4-93, Carter Spit ACEC: Please see our comments from Chapter II, concerning the post-planning, post-conveyance additions to the ACECs.	Please see response to comment 5-15.
3-2	We recommend that the Final RMP/EIS identify specific management goals and objectives for each ACEC, RMA and WSR (if applicable) to ensure compatible uses and protection of these areas. The ROD should commit to the development of future management plans for each ACEC, RMA, and WSR, as appropriate.	Please refer to Chapter II, section D.3.a.5.a. Also, throughout Chapter II, management objectives for each resources per the various alternatives are described. Where applicable, resource management for special designations is described.
5-15	Page 2-51 through 2-52, Special Designations: Please reference Appendix A as containing pertinent information regarding the rationale for designation. Although the plan generally describes these lands for the Carter Spit ACEC, the plan is unclear as to how such lands would be included in the ACEC following resolution of selections. Please include a section explaining how this will be accomplished. Is an amendment to the RMP anticipated?	A reference to Appendix B has been added in Chapter II, section D.3. Additional information pertaining to expectations of ACEC and selected lands not conveyed has been added to Chapter II, section D.3.a within the FEIS.

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40-1	The great portion of the proposed Carter Spit ACEC covers unencumbered federal lands centered on Twin Mountain, within the separate Jacksmith Creek and Cripple Creek watersheds, and a one to two mile reach of the Indian River which passes into and outside the proposed ACEC southern boundary. We find the name of the proposed ACEC to be extremely misleading. The entire proposed ACEC might be split into two separate ACEC's reflecting the names and geographic areas they include.	Please refer to Maps 2.32 and 2.33. The boundary of the Carter Spit ACEC within the FEIS has been altered from that proposed within the DEIS. Though BLM appreciates your concern, the name of the Carter Spit ACEC will not change.
40-2	The nature and extent of the proposed eastern boundary of the proposed ACEC appears to be a watershed boundary and as such, runs along the divide separating these watersheds from the tributary streams of the Arolik River. This sort of boundary has several management problems. It divides mountains and ridges, with resulting differing management regimes and potential ROP's on either side of the mountain or ridge. The boundary line is meandering and difficult to ascertain on the ground. A section line could form the eastern boundary of the proposed ACEC. We recommend that the western half of the Township 9 South, Range 73 West be included in the proposed ACEC, and the eastern half of the township be excluded from the ACEC. Mitlak Mountain, a prominent bedrock feature with some mineral resource potential, should not be partly within and partly outside the ACEC. Sections 30, 31, and 32 of Township 8 South, Range 72 West should be included in the ACEC.	Please refer to Maps 2.32 and 2.33. The proposed boundary for the Carter Spit ACEC as been altered from that proposed within the Bay DEIS. This boundary change completely removes Mitlak Mountain from the Carter Spit ACEC. This new proposed ACEC boundary more closely matches characteristics described in Appendix A of the Bay RMP and criteria established within 43 CFR 1610.7-2 for ACEC designation.
22-1	Should eligible rivers be recommended for inclusion in the National Wild Rivers system? The RMP can recommend select rivers or river segments. However only congress may designate rivers to the system. How is this process continued from RMP to designation. Why is this included with this RMP?	Please see inset in Chapter II, section D.3.b.1. Additional information concerning WSR within this RMP/EIS can be found in Appendix B. In addition, rivers considered for designation are addressed under Alternative C. The process for WSR nomination is described within the Wild and Scenic Rivers Act (16 U.S.C. 1271-1287) or The Wild and Scenic Rivers Study Process (Diedrich,1999).
69-49	BLM should follow suit with the Final East Alaska RMP/EIS decision to (a) defer the suitability determination for eligible rivers until ANCSA and State entitlements are met, (b) provide strong interim management of eligible river corridors, including prohibition of mineral exploration and development, and (c) commit to conduct a future valid suitability assessment of all eligible rivers that are retained under permanent BLM management...The Glennallen Field Office made this change in the final RMP/EIS due to substantive public comment and we request that the Anchorage Field Office act accordingly.	Though land status is currently evolving throughout the Bay planning area, is was decided that a suitability determination (Appendix B) would not be deferred for the Bay RMP/EIS. Land status within the Bay planning area is more certain compared to the lands status of the East RMP during its development. Consequently, three substantive comments concerning WSRs were received during the public comment period of this draft document.

RMP Process

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22-3	My questions are why are we commenting on alternatives ABCD when BLM can modify these alternatives after the Public Comment Period. The statement does not explain if in fact a second public comment period would be held (90 days & please to review the modified alternative)	As per 43 CFR 1610.5-2(a) any individual that participates in the planning process may file a protest on the Proposed RMP/Final EIS. A protest must be filed 30 days after publication of the Notice of Availability for the Proposed RMP/Final EIS in the Federal Register.
22-4	Who can participate in the 30 day protest period after the governor's consistency review?	Anyone who participated in the planning process by sending written comments, making oral comments (at a hearing or meeting), attending a public meeting, calling the BLM field office, and/or discussing the project with BLM employees in the field.
22-5	Who resolves the protests?	As per 43 CFR 1610.5-2(3) the BLM Director shall render a decision on any protest.
22-6	Who can protest?	Please see response to comment 22-3.
22-9	What land tenure would allow BLM to consolidate disincontiguous blocks of land to benefit land management for the people of the US	FLPMA section 205, 43 USC 1715
22-10	Who made this assumption that public land would/should be made available for this use?	Public lands are managed and used in accordance with the intent of congress as stated in the Federal Land Policy and Management Act (43 USC 1701) and under the principles of multiple use and sustained yield. Proposals considered within the Draft RMP/EIS are consistent with the Planning Criteria and Legislative Constraints listed in Chapter I, section F of the Final RMP/EIS.
56-3	The BOF recently recommended that a special panel review current protections for fish habitat in the entire Bristol Bay area, and is continuing study on the proposal that many lakes and streams in the area be included in fish refuge. This designation would provide for increased habitat protection aimed at water quality in salmon spawning streams. In addition, there is a new administration taking control of state functions, and there may be legislative efforts in the new year aimed at reviewing the status of Bristol Bay streams, with the hope of strengthen protection of these world-heritage class fisheries. A memorandum or understanding between the BLM and ADF&G in 1983 states the following with regards to BLM management plans of fish and wildlife habitat. BLM agrees to : "Incorporate ADF&G's fish and wildlife management objectivities and guidelines in BLM land use plans unless such provides are not consistent with multiple use management principles established by FLMPA, ANILCA and applicable federal laws." (dRMP pg 1-24) And: "BLM plans must be consistent with officially approved or	Please see page 1-22 of the RMP which provides: BLM planning regulations require that BLM plans be consistent with officially approved or adopted resource-related plans of other agencies to the extent those plans are consistent with Federal laws and regulations applicable to public lands. The BLM will honor existing MOUs with ADF&G. Also, see response to comment 69-8.

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	adopted resource-related plans of other agencies to the extent those plans are consistent with Federal laws and regulations applicable to public lands." (dRMP, pg. 1-24). BLM must coordinate the Bay plan with any new information and management objectives provided by the state.	
60-1	Congress went on to specify that the first purpose of region management would be "to conserve the fish and wildlife and other significant natural and cultural resources within the region." ANILCA 1203 (b)(1); 16 U.S.C. 3183 (b)(1). This backdrop of Departmental and Congressional recognition of Bristol Bay's extraordinary resources must inform BLM actions and decision-making.	The Federal Land Policy Management Act (FLPMA) clearly states that during land use planning, the Secretary will "use and observe the principles of multiple use and sustained yield set forth in this and other applicable law." This guidance and ANILCA's policy for Federal land management in Alaska are not mutually exclusive. The Draft RMP/EIS recognizes both laws in its Planning Criteria listed in Chapter I, section F. The goals and management actions stated in Chapter II express BLM's intent to allow responsible development of resources while providing measures for resource protection.
61-3	The BLM would be contradicting it's stated purpose to be "compatible with those of neighboring land managers" if it were to arrive at a Record of Decision regarding the Bay RMP before the State sorts out what its position is on protecting fish and wildlife habitat in the Bristol Bay areas.	The most current information available was used to develop this RMP. BLM will continue to be consistent with officially approved or adopted resource-related plans of other agencies to the extent those plans are consistent with Federal laws and regulations applicable to public lands as stated in Chapter I, section G.3.b.
67-1	The BLM may have some idea of intended uses for State lands, but its draft EIS shows no significant understanding of intended uses on adjacent Native corporation lands.	Please see "Tribal Consultation" in Chapter V, section C.3.
67-2	The Land Trust, along with the Nushagak-Mulchatna Watershed Council and the Nature Conservancy, have been gathering information from the regions residents and recreational users on the areas within the Nushagak watershed importance for subsistence and recreation. Currently, being mapped. In addition, the Alaska Department of Fish and Game has recently completed studies of fish habitat in the Nushagak watershed. Currently, being mapped. The two data sets will be combined into a recommended Traditional Use Area Conservation Plan for the Nushagak watershed and should be available within the next few months.	See response to comment 61-3.

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69-22	Hard-rock mining is practiced in a manner inherently threatening to human health to people living near, downstream or downwind from mines. Therefore, we object to the revocation of ANCSA d-1 withdrawals from the sensitive fish, bird and wildlife habitat, subsistence use areas, and otherwise remarkable resources that are discussed throughout this document. Managing for the preservation of these unique and irreplaceable public resources should be the priority of the Bay RMP.	The Bureau is mandated by Congress to manage the land for multiple use, FLPMA section 102 (a) (7), 43 USC 1701(a) (7). Additionally, the Final RMP/EIS analyzes the maintenance of the ANCSA 17(d)(1) withdrawals within the range of alternatives considered, Chapter II.
70-2	I'd like to start off urging the [BLM] to extend the comment period, and to make the opportunity for comment a little broader than it is right now. Sixty or 90 days extension would certainly be appropriate.	BLM extended the 90-day comment period by 30 days, September 29, 2006 to February 5, 2007.
70-7	…you have basically added the unencumbered BLM land in the Nushagak/Mulchatna drainage into this planning document, because it is unencumbered. What you should have done is separated out these two areas into separate management plans rather than putting them into one document.	Thank you for your comment.
1-1	With respect to lands included in the plan that adjoin the Togiak NWR, we are concerned that the draft document's range of alternatives appears to be quite narrow. The plan would benefit if a fuller set of alternatives was developed to include more options relative to mineral development than is displayed in the draft plan	Please see response to comment 30-1.
70-3	I think the range of alternatives that are present in the plan is not broad enough in scope. I think the critical element in the minds of the residents of Bristol Bay region is the issue of hard rock mining. While the plan spends considerable time addressing the issues of hard rock mining, one of the alternatives is not, but should be, one that completely rules out hard rock mining altogether.	Alternative A would retain all existing ANCSA 17(d)(1) withdrawals; the Draft RMP/EIS analysis assumes no mineral leasing and very limited mineral location under this alternative. See response to comment 30-1.

Concerns with NEPA Adequacy

Letter-Comment#	Comment	Response
1-6	Under the Findings Section for Alternatives B, the plan states that if "the amount of oil and gas exploration or anticipated area of development expand, this finding may need to be revised." This provides an open door to increasing the levels of resource development without the benefit of the NEPA process.	All permitted activities occurring on BLM-managed lands are subject to the provisions of NEPA, 42 USC 4332. If the amount of actual oil and gas development exceeded the maximum amount predicted by the analysis presented in the Draft RMP/EIS, a plan amendment to the Bay RMP would be prepared. This would include more public participation.
3-6	In addition to communication required under the National Historical Preservation Act (NHPA) of 1966, BLM is subject to Executive Order 13175 Consultation and Coordination with Indian Tribal Governments. If tribal consultation has occurred with all interested federally-recognized tribal governments in the planning area, it should be discussed in more detail. If not, BLM should immediately invite tribal governments in and adjacent to the planning area to initiate consultation with the agency. These consultations should be documented in the Final EIS.	Please see Tribal Consultation, Chapter V, section C.3 in the FEIS.
30-1	First, I don't think you've fully considered all reasonable alternatives. Two of the alternatives are located at one extreme (virtually no oil and mineral development) and the other two, including the preferred alternative, are at the opposite extreme (opening all or almost all BLM lands to mineral development). I find that this is a predecisional selection of opening these lands to mineral development, virtually forcing the decision maker to select one of the development alternatives. Instead, I ask that you consider various incremental increases in development as alternatives rather than the two extremes.	The Final RMP/EIS analyzes a reasonable range of alternatives. Please see Chapter II, section B. Alternative D strikes a balance concerning these alternatives.
49-1	We are writing to inform you of BLM's potential violations of the National Environmental Policy Act in providing inaccurate and misleading information in public meetings for the Draft Bay Resource Management Plan and Environmental Impact Statement (RMP/EIS). We are concerned that a chart depicting the draft plan's Range of alternatives, presented at the Anchorage public meeting on November 28, 2006, poses a significant contradiction to the alternative published in the draft Bay RMP/EIS on September 29, 2006. The Range of Alternatives chart (Slide 6 of your PowerPoint presentation), states that in BLM's Preferred Alternative, "all lands except 67,000 acres open to leasable and locatable minerals." You identified these lands as the proposed 63,000 acre Carter Spit Area of Critical Environmental Concern	A direct mailing was conducted which explained this error to all participating attendees of public comment meetings prior to the December 8, 2006 for the Bay DEIS. A handout was provided with the corrected information. Also, the public comment period was extended to February 5, 2007 to provide adequate time for public response to this matter. No additional comment was received regarding slide 6 of the Bay DEIS Anchorage public meeting on November 28, 2006. Chapter II and Chapter IV have been modified within the Bay FEIS to account for this error. Modifications to this document have been made in response to internal and external suggestions and comments received during the public comment period of the DEIS. This process is keeping with procedures established by the NEPA.

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	(ACEC) and an additional 4, 000 acres. You also explained that maintaining current mineral withdrawal restrictions is "necessary to manage and protect resources", and that an additional level of planning will be conducted to determine which specific lands within the Carter Spit ACEC will be opened to mineral entry in the future. However, according to Tables 2.7, 2.8, and 2.12 of the draft Bay RMP/EIS, the Carter Spit ACEC will be OPEN to fluid mineral leasing "subject to seasonal and other minor constraints", and OPEN to locatable mineral entry "subject to more stringent Required Operating Procedures." Furthermore, the draft RMP/EIS contains no discussion of either maintaining current mineral withdrawals within the Carter Spit ACEC, or of the agency's alleged intention to defer the decisions regarding which of these ACEC lands should be opened or remain closed to mineral entry until a future level of planning.	
60-2	On one hand, the Draft RMP indicates that 982,000 acres of public land in Kvichak and Nushagak drainages would be incorporated into a Bristol Bay Area of Critical Environmental Concern (ACEC) and that these lands would be closed to mining claims. Id. At 2-92, 4-98. Other sections of the Draft state just the opposite specifying that public lands in the ACEC "would be OPEN to locate mineral entry" (emphasis added). Id. at 2-52; 4-92. this is a fundamental inconsistency which must be resolved clearly and presented to the public. These diametrical y opposed prescriptions for Alternative C render it useless as an alternative and mean that the DEIS fails to provide a sufficient range of reasonable alternatives as required by applicable Council on Environmental Quality rules. 43 C.F.R. Part 1500>	This inconsistency has been resolved in the FEIS. Please refer to Chapter II, specifically section B.
61-1	Although "the Bay RMP/EIS [is supposed] to provide a comprehensive framework for managing and allocating uses of the public lands and resources within the Bristol Bay and Goodnews Bay area of southwest Alaska," we do not see where it articulates what criteria will be followed when the uses of one resource conflicts with another.	Use restrictions and other measures are developed and employed to achieve a balance in the beneficial use of all resources under BLM's multiple use mandate. The criteria for resolving resource conflicts is based on the application and compliance with planning criteria listed in Chapter I, section F of the FEIS. This criteria allows BLM to designate ACECs that recognize and protect resource values, yet allow for responsible mineral exploration or development within those ACECs, as long as resource values are protected. This can be done through application of Required Operating

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		Procedures, stipulations, and standard lease terms (Appendix A), or project-specific measures identifies in additional NEPA analysis.
69-14	Regarding locatable minerals, Alternatives B, C, and D all propose to revoke existing d-1 withdrawals throughout the vast majority of the planning area. Under Alternatives B and D, BLM would also open virtually the entire planning area (2,499,823 acres) to locatable mineral entry. Alternative C identifies a sum of 1,071,189 acres that would be closed to mineral entry, although the administrative or Congressional authority by which these lands would be withdrawn is not specified. Id. at 2-35. This figure represents most all of the unencumbered lands in the planning area, except approximately 26,499 acres, and the reader is left to assume that the selected lands in the planning area would be opened to locatable mineral entry if the selections are relinquished. ... the draft Bay RMP fails to offer a reasonable range of alternatives for locatable mineral entry. BLM is required in the RMP/EIS to present a valid range of alternatives, not simply two extreme options which propose either opening or closing lands to mining. BLM should develop alternatives that provide a full range of proposed land uses, as required by NEPA. This would require BLM to develop alternatives that provide a true spectrum of development and preservation. It has failed to do so in the draft Bay plan. The alternatives in the Draft RMP/EIS are almost identical in allowing oil, gas and mining development on over 99 percent of the planning area. Such a narrow range of alternatives violates the letter and the spirit of NEPA.	See response to comment 30-1.
69-16	Under Alternative A, no oil and gas or mining would occur, except BLM may approve such activity on a case by case basis. Id. at 2-24, 33. Under Alternatives B, and D, BLM would open virtually the entire planning area (2,499,823 acres) to oil and gas development. This constitutes approximately 99.8 percent of the planning area. Id. at 2-26, 35. Alternative C would open only slightly fewer lands (2,484,696 acres) to oil and gas development. A 15,127 acres difference between Alts. B/D and Alt. C does NOT constitute a reasonable range of alternatives for oil and gas development in the Bay planning area, since each of these alternatives essentially propose to open all BLM-managed lands to leasable mineral entry.	See response to comment 30-1.

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69-17	the draft Bay RMP fails to offer a reasonable range of alternatives for locatable mineral entry. BLM is required in the RMP/EIS to present a valid range of alternatives, not simply two extreme options which propose either opening or closing lands to mining. The impacts to subsistence resources and uses stand to be significantly impacted by proposed changes to management of mineral resources and in the draft plan's preferred alternative, and the draft plan has failed to give the subsistence users a full spectrum of options for development and preservation of resources.	Please see response to comment 30-1.
69-27	BLM failed to comply with NEPA in analyzing mineral leasing impacts. In direct contravention of its duty to take a "hard look" at potential environmental effects, BLM solely listed general potential impacts.	Please see response to comment 60-11.
69-6	Conflicting information is presented throughout the draft plan regarding the status of existing d-1 withdrawals in this area. On one hand, the Draft RMP indicates that 982,000 acres of public land in the Kvichak and Nushagak drainages would be incorporated into a Bristol Bay Area of Critical Environmental Concern (ACEC) and that these lands would be closed to mining claims. Id. at 2-92, 4-89. Other sections of the Draft state just the opposite specifying that public lands in the ACEC "would be OPEN to locate mineral entry" (emphasis added). Id. at 2-52; 4-92. This is a fundamental inconsistency which must be resolved clearly and presented to the public. These diametrically opposed prescriptions for Alternative C render it useless as an alternative and means that the DEIS fails to provide a sufficient range of reasonable alternatives as required by applicable Council on Environmental Quality rules.	Please refer to response to comment 60-2.

Public Involvement

Letter-Comment#	Comment	Response
6-1	Please extend time to comment. Can you make sure animal protection groups get this plan-please reach out so that we can have voices for these poor animals that are treated as if they are non existent by your agency? It is also clear that in all cases such animal protection groups are completely excluded by design and purpose.	Please see response to comment 70-2. A notice of availability was published in the Federal Register regarding the availability of the Bay DEIS. The DEIS was available in electronic format via the world wide web or as a hard copy or on compact disk sent through regular mail upon request.
12-2	May I also suggest that your meetings be advertised on Bay Cablevision's "Reader Board" so the public is aware of your presence. I have personally reminded people about your meeting today since they had no idea you were here for public comments.	Thank you for your comment.
21-1	I do not think 90 days is adequate review time. I would like to request an extension of the comment period. I feel that the public has not had adequate access to the EIS study or time to review the proposed land use designations. Considering the scale of this land use area, 90 days is not much review time. The review period was further complicated by being held over the holiday season. Many people in rural Alaska travel over Thanksgiving (November) and Christmas (December)	Please see response to comment 70-2.
21-2	The public meeting held by BLM in NakNek, King Salmon, and Dillingham was scheduled in conflict with a regional fisheries conference many of the active citizens and community leaders were attending the fisheries conference unable to attend the BLM informational meeting	Please see response to comment 70-2. The comment period was extended to allow for any potential conflicts that may have occurred.
21-3	Public Meetings should be held in all villages within the Bay/EIS boundaries. Public Meetings should be rescheduled in Dillingham, Illiamna, New Stuyahok, Aleknagik, King Salmon and NakNek.	Meetings were held in most villages you have mentioned. Chapter V within the FEIS will be updated to reflect the latest information.
21-4	The most effective advertising for meetings should be used. The prior public meetings did not even make the front page of the Bristol Bay Times no follow up story appeared after the presentations. The most effective advertising would be the Bristol Bay Times, (not the back page), KDLG Radio, notices on community bulletin boards, and notice to all village councils and municipalities.	Thank you for your comment.

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30-2	The plan clearly recognizes the common theme among commenter's of the importance of protection of the habitats of moose, caribou, fish, and other subsistence resources (p. 1-15 through 1-16). However, those concerns were dismissed, using the rationale that the Plan will not affect subsistence or hunting and fishing regulations, and thus these concerns will be adequately addressed under the regulatory responsibility of ADFG and Federal Subsistence Board.	Potential impacts to subsistence are discussed in Chapter IV, section D.10 and in the ANILCA 810 analysis (Appendix D). Chapter IV in the FEIS has been revised from that offered in the DEIS using your suggestions.
49-2	Range of Alternatives chart (powerpoint slide 6 from Anchorage public meeting 11/28/06). BLM must revise the Range of Alternatives chart, provide proper public notice of the erroneous information, and widely distribute a corrected explanation of the plan's alternatives to the public. BLM also should extend the public comment deadline by at least 60 days to provide the public adequate time to analyze and comment upon the new information. If BLM fails to do so, it likely will be found to have violated its NEPA obligations.	Please refer to response to comments 48-1 and 49-1.
69-13	an inaccurate chart of the draft Bay plan's Range of Alternatives was displayed at the Anchorage public meeting on November 28, 2006, was in direct contradiction of the draft RMP/EIS. We are concerned that BLM may have complicated, and possibly discouraged, public comment on this issue by distributing misleading information.	Please see response to comments 48-1 and 49-1.
70-6	I'd like to see the comment period extended in order to give the other landowners, the native allotment landowners an opportunity to give their comments.	Please see response to comment 21-1.

General

Letter-Comment#	Comment	Response
4-6	BLM should give further consideration to the potential indirect effects of oil and gas development and mining with respect to a change in the marine vessel transportation pattern in and around Goodnews Bay, as well as direct and indirect effects to Steller's eiders from contamination of marine waters and marine	Chapter IV within the FEIS has been revised from that offered in the DEIS. As described in the Reasonably Foreseeable Development (RFD) Scenario, oil and gas development would likely occur only in the Koggiling Creek planning block (Nushagak Bay). See Chapter IV, section B.3.c.1.

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	invertebrates. BLM's management actions are on land, the interrelated and interdependent effects to the marine environment that would not occur "but for" BLM's actions must be considered.	
26-1	It is apparent that the BLM has not studied the relationship and affect that industrial mining, and particularly large scale mining has on salmon, other resident fishes, and all local interdependent living organisms….	Chapter IV of the plan addresses the effects to fisheries from mining, section C.4. The plan implements a number of Required Operating Procedures, which will be applied to surface disturbing activities, including mining, and oil and gas Stipulations to mitigate impacts identified in the plan. All proposed activities occurring on BLM-managed lands will be further analyzed for effects to fisheries within project-specific NEPA analysis.
69-4	In the RMP/DEIS, BLM states that it is likely that industrial activities could cause irreparable damage to the planning area. We are left to wonder how BLM can propose to open up lands for mineral development within the Bay planning area, in direct contrast to public opinion, particularly within proposed ACECs, and remain in compliance with its own guidance. To do so appears to violate BLM's Federal Land Policy Management Act (FLPMA) mandate to provide "special management attention . . . to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes." For this reason we request BLM to include the modifications outlined in our comments, and adopt them into the Final RMP/EIS.	Please see response to comment 44-2.

Required Operating Procedures (ROPs) and Oil and Gas Leasing Stipulations

Letter-Comment#	Comment	Response
3-4	The Final RMP/EIS should identify and evaluate the types of research, monitoring, and compliance activities being conducted in the Bay Area to ensure that proposed actions, stipulations, and Required Operating Procedures (ROPs) would be effective in providing full protection of sensitive subsistence, cultural, and environmental resources. The Final EIS should discuss what types of monitoring would be conducted to ensure that development activities meet the requirements of the ROPs, oil and gas stipulations, and standard lease terms.	A monitoring plan will be developed and submitted in the Record of Decision for the Bay RMP. A monitoring plan is required by 43 CFR 1610.4-9. Monitoring and mitigation will also be included in NEPA documents for any development activities when they are proposed. In addition, Appendix A, section A.3, states that the Authorized Officer (AO) or their representative is responsible for seeing that the permittee is complying with the conditions [ROPs and Stipulations] of the permit.

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42-1	Stipulations, required operating procedures, buffers, and Area of Critical Environment Concern designation are not sufficient protective tools for the mitigation of mining impacts upon BLM lands.	Use restrictions and other measures are developed and employed to achieve a balance in the beneficial use of all resources under BLM's multiple use mandate. Please see response to comments 44-2 and 4-3.
40-3	We recommend analysis by BLM engineering and economic mineral specialists to determine appropriate, effective and feasible ROPs for any contemplated development in the proposed ACEC, including appropriate criteria required for any potential development project. Such criteria might include technical, environmental and financial capability within any company proposing development projects, of any kind, in the ACEC.	The ROPs presented within the FEIS were developed by geologists, hydrologists, and fisheries and wildlife biologists using criteria within the Alaska Land Health Standards (Appendix A). ACEC designation and planning, together with project-specific environmental analysis and regulatory compliance, will result in controlled development and maintenance of other resource values.
48-1	I was confused by a portion of your presentation at the Anchorage meeting which addressed plans for the Carter Spit ACEC. I hope you can help me understand.. According to Slide 6 - Range of Alternatives - "All lands except 67,000 acres open to leasable and locatable minerals". You identified these lands as the Carter Spit ACEC (63k) and an additional 4,000 acres, and explained that future step-down level planning will determine which lands within the ACEC will be opened to mineral entry. However, in the draft RMP/EIS, it appears that this ACEC will be open to fluid mineral leasing "subject to seasonal or other minor constraints", and open to locatable mineral entry "subject to more stringent Required Operating Procedures". Also, I did not see any discussion of plans to postpone and address these decisions in the ACEC planning stage.	A direct mailing was conducted which explained this error to all participating attendees of Bay DEIS public comment meetings prior to December 8, 2006. A handout was provided with the corrected information. Also, the public comment period was extended to February 5, 2007 to provide adequate time for public response to this matter. No additional comment was received regarding slide 6 of the Bay DEIS Anchorage public meeting on November 28, 2006. Chapter II and Chapter IV have been modified within the Bay FEIS to account for this error. Modifications to this document have been made in response to internal and external suggestions and comments received during the public comment period of the DEIS. This process is keeping with procedures established by NEPA. Chapter II describes management objectives for proposed ACECs in accordance with BLM Manual No. 1613, Section 33.C (Provision for Special Management Attention).
61-2	The Draft RMP/EIS recognizes the cornucopia of renewable resources that exist in the Bristol Bay region and provides extensive information regarding each. The report also elaborates on four alternatives, discusses the environmental consequences of each lists Required Operating Procedures to mitigate impacts. However, these factor are discussed from such a generic perspective that there isn't a clear picture of the problem resulting from the principal motive of this exercise; which is to open BLM lands in the Bristol Bay area to mineral leases and mining claims. It is not apparent how this land may look in one or two decades.	Please see Chapter IV. This chapter has been modified within the FEIS compared to that offered within the DEIS using comments and suggestions received during the public comment period for the Bay DEIS.

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1-4	Plan does not provide sufficient protection regarding Arolik River and its resources.	Please see reference to Alaska Land Health Standards, goals for Vegetation, Wetland, and Riparian Habitat and Soil, Air, and Water in Chapter II. Also, ROPs, Stipulations, and Standard Lease Terms (Appendix A) designates a 300-foot setback of no surface occupancy for the East and South Fork Arolik River.
5-19	Page 2-74, ROP Rec-1m: Please clarify that commercial guides are also required to register with the Dept of Natural Resources.	Commercial guides are required to obtain a State of Alaska business license as a condition of receiving a Special Recreation Permit. BLM does not require guides operating solely on Federal lands to register with DNR. Refer to Appendix A, Special Recreation Permit Conditions and Stipulations.
3-5	The Draft RMP/EIS incorporates a number of ROPs, oil and gas leasing stipulations, and standard lease terms. We recommend that the Final RMP/EIS address additional requirements for the abandonment, removal, and reclamation of activities relating to oil and gas and mineral/coal exploration, development, and operation after leases have expired and operations have ceased. The discussion should identify responsible parties, sources of funding, and the extent to which abandonment, removal, and reclamation would be considered complete. We recommend that general performance criteria for how areas impacted from resource development would be restored and rehabilitated, and any post monitoring, if any, would be required. In addition, the Final RMP/EIS should identify the types of monitoring and corrective actions required to ensure that abandonment, removal, and reclamation actions would be completed.	Details of abandonment, removal, and reclamation are described within project-specific notices or plans of operations. Reclamation, Bonding requirements, unnecessary degradation, and requirements for environmental protection are described within 43 CFR 3809, referenced in Chapter III, section C.3.b.6.
1-11	If the miners have any legal right at the site, BLM should insist that the most stringent environmental conditions be met throughout the project.	Thank you for your comment. Please see response to comments 3-5 and 4-3.
14-2	We ask BLM to approve Alternative C with stronger elements added. Everything within BLM's authority should be done to block mining from the Bristol Bay watershed, including the Pebble mine. The added mining district should be rejected and the existing withdrawal should be kept in effect, both against Mining Law activities and all forms of mineral leasing. We favor ACECs as proposed for more than a million acres, with conditions added strictly barring mining and mineral leasing. Wild & Scenic River segments should be established to protect the crucial rivers, such as the Kvichak, Nushagak and Mulchatna, which are essential to the rich fishery of Bristol Bay.	Please see comment 15-1. BLM has no authority concerning permitted activities occurring on State managed lands (i.e. proposed Pebble mine). Alternative D (preferred alternative) within the FEIS recommends lifting ANCSA 17(d)(1) withdrawals and establishing a Carter Spit ACEC. Please see response to comments 44-2 and 4-3.

Letter-Comment#	Comment	Response
58-4	Existing large mines in Alaska have demonstrated that responsible mining and other land use activities can peacefully co-exist.	Thank you for your comment.
69-25	Fully protective stipulations attached to leases for resource are far superior to ROPs as described in the Draft RMP/EIS. BLM was over-reliant on ROPs. BLM must impose fully protective measures as stipulations.	Please refer to Appendix A, section D describing Stipulations. Stipulations apply to oil and gas leasing and ROPs apply to all permitted activities. Please see response to comments 4-3 and 50-1.
69-25	BLM failed to identify the most relevant mitigation measures. Nowhere did BLM attempt to analyze the effectiveness of the stipulations and ROPs or explain how they were developed.	Please refer to Appendix A, sections 1-3.
69-29	The Final RMP/EIS also must clarify and provide a detailed explanation of how the BLM may tier off the document for future decision-making on resource development or other activities that may damage resources or resource values. The Authorized Officer should not be allowed to waive Required Operating Procedures or stipulations. An additional public process should be conducted if industry asks BLM to change their ROPs and Stipulations and if the changes are likely to affect critical habitat or subsistence user areas, key stakeholders in the region must be consulted regarding the changes.	Please refer to the Executive Summary, sections A and B; Chapter I, section G; and Table 1.2. In addition, every action taken by the BLM requires compliance with current resource management plans and will be subjected to project-specific analysis under NEPA.
69-30	DR&R requirements must be added to the Final RMP/EIS. BLM has yet to develop specific DR&R requirements to meet its overall obligation of returning the disturbed land to its previous primary uses as fish and wildlife habitat and for subsistence uses by native villagers.	See response to comment 3-5. Also, DR&R requirements are identified within project-specific NEPA processes and stipulated within permits.
5-17	Page 2-64, ROP FW-1a: While we appreciate the edit including ADNR in this ROP, please consider rewording the first portion of this statement as follows: *"The Alaska Department of Fish and Game and Natural Resources* should be consulted…."	This change has been made to ROP Fish and Wildlife - 2a.
5-18	Page 2-65, ROP FW-3b, 3c: Please review this ROP. We found it to be confusing and possibly unnecessarily restrictive. It appears that the text "ROP FW-3c" (not bolded) could be deleted. Additionally, the fourth line identifies those uses that would not be permitted unless a field evaluation has been conducted by qualified personnel. We assume that BLM's intent is that these individuals can then advise the AO that certain activities are permittable or that accommodations in the permit can be made based upon the actual location of the caribou. Clarification of BLM's intent and practical review of the activities prohibited would be beneficial.	ROPs proposed within the Bay FEIS have been altered compared to those proposed within the Bay DEIS. These ROPs will help protect the Mulchatna, Northern Alaska Peninsula, and Nushagak caribou herds. The importance of this wildlife resources within the Bay planning area are described in Chapter III.

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69-31	ROP FW-3a. Coal exploration activities should be limited to between May 20-August 15. Coal exploration between August 16-May 19 should not be allowed. These ROPs should apply all lands outside ACECs which should prohibit industrial activities, and absolutely no development activities should be allowed in areas identified by ADF&G as core habitats for the Mulchatna caribou herd.	ROPs have been improved within the Bay FEIS compared to that offered within the DEIS and can be found in Appendix A. Your comments were taken into account for development of ROPs.
69-32	ROP FW-3d. Aircraft flights for exploration and development activities should be conducted at least 2,000 ft AGL (except for take-offs and landings). During exploration activities, low flying aircrafts should not be allowed to harass wildlife. This ROP should identify how it will be enforced. These ROPs should apply all lands outside ACECs which should prohibit industrial activities, and absolutely no development activities should be allowed in areas identified by ADF&G as core habitats for the Mulchatna caribou herd.	ROPs have been modified within the Bay FEIS compared to that offered in the DEIS and can be found in Appendix A. Please refer to section A.3 of Appendix A, which describes the AO's authority to enforce ROPs and Stipulations. The ROP you are referencing is now ROP FW-3a which references Federal Aviation Administration Advisory Circular No: 91-36D.

Maps

Letter-Comment#	Comment	Response
5-56	Page 3-229, Figure 3.39 D(1) Withdrawals We suggest moving the map of 17(d)(1) withdrawals forward so that it is located closer to the text describing the (d)(1) withdrawals on page 3-215. Currently it immediately follows page 3-227 discussing 17(b) easements. We found the mapping of all withdrawals to be very useful.	Thank you for your suggestion. All maps, previously found spread throughout the DEIS, are now located within a single volume of the FEIS. These maps are situated in order as referenced within the text.
5-57	Page 3-239, Alagnak Planning Block 17(b) Easements Please recheck the associated figures for the 17(b) easement descriptions. Only figure 3.47 has a legend that describes 17b easements, figures 3.43 (this figure is referenced in a discussion of 17 (b) easements), .44, and .45 and .48 on a subsequent map page appear to be missing the easement information described in the text or are missing an appropriate title. Figures 3.53, 54, 55, 56, do have easement information.	This inconsistency will be corrected in the Proposed RMP/Final EIS.
5-66	Maps General Comments It would be helpful if the maps, particularly those focusing on small subsets of the planning area, contained a vicinity map indicating the subject area's relative location in the planning area or the state.	Within the FEIS, vicinity maps have been included on maps addressing areas small in scale.

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3-8	Page iii Provide definition for FLMPA acronym.	This suggestion will be incorporated within the FEIS
3-9	• Figure 1-1 Indicate by color those lands are dual-selected (state and ANCSA corporation).	Please see Map 1.2. Your suggestion has been incorporated into the FEIS.
55-13	Pg. 3-191, Lode Deposits. Several geographic place names, such as Kasna Creek, Shotgun, and Johnson River, are referenced but not shown on a map in the DRMPEIS.	Please see Map 3.30. The place names indicated within the text have been added to maps within the FEIS.
55-14	There should be a space above Gold Placer Deposits.	This change has been made within the FEIS.
5-50	Chapter III-Affected Environment Figure 3.8a Landcover: Lowland/Upland Herbaceous Tundra. It would be helpful if the gray background lands were identified in the Legend. In addition or alternatively, clarify on page 3-32 that the land cover maps depict the location of various land cover types on a gray background.	See Map 3-8a. This change has been made within the FEIS.
5-51	Figure 3.14 Moose Habitat We suggest changing the direction of cross-hatching for rutting habitat on this map.	See Map 3.16. The legend on maps within the FEIS will have more disguisable characters.

Climate Change

Letter-Comment#	Comment	Response
69-37	...the draft plan fails to fully consider the cumulative impacts the proposed management strategies will have on the climate, landscape, wildlife habitat, and resources of Southwestern Alaska. (Arctic Climate Impact Assessment. 2004., p 9. See also Hinzman, et. al. 2005. Evidence and Implications of Recent Climate Change in Northern Alaska and other Arctic Regions. Climatic Change 72: 251-298.). The draft Bay plan makes only a few passing references to climate change and the warming of the arctic—and seems to refer to a non-peer reviewed paper completed with data from the winter of 2000-2001 to suggest that it may not be occurring at all. That paper's author, John Papineau of the National Weather Service in Anchorage, confirms that a global rise in temperature is occurring (Conversation with John Papineau, August 29, 2006) and assumes as much in a paper completed in 2005. (Papineau, John. 2005. Winter Temperature Variability Across Alaska During El Nino Events.) Regardless, there is no credible scientific debate at this point about the warming of the arctic, and the BLM has a responsibility to acknowledge that reality.	Climate change is a matter of growing concern that spurs much debate. Please see the response to comment 22-1. References pertaining to global warming also include US Forest Service and University of Alaska. In addition, effects to resources from climate change is discussed in throughout Chapter IV.

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69-38	The draft Bay plan makes only a few passing references to climate change and the warming of the arctic—and seems to refer to a non-peer reviewed paper completed with data from the winter of 2000-2001 to suggest that it may not be occurring at all. That paper's author, John Papineau of the National Weather Service in Anchorage, confirms that a global rise in temperature is occurring (Conversation with John Papineau, August 29, 2006) and assumes as much in a paper completed in 2005. (Papineau, John. 2005. Winter Temperature Variability Across Alaska During El Nino Events.) Regardless, there is no credible scientific debate at this point about the warming of the arctic, and the BLM has a responsibility to acknowledge that reality.	Please see the response to comment 69-37.
69-40	While climate change is complex, recent research has helped line out some recent trends for Alaska. First, as temperatures rise, discontinuous permafrost is warming and thawing, resulting in extensive areas of marked subsidence of the surface. (Hinzman, et. al. 2005. p 262.)	Please see the response to comment 69-37. In Chapter III, section B.1.b, the plan states the following: "Regional environmental warming is affecting areas traditionally underlain by permafrost, melting frost wedges, changing drainage patterns, and drying up small lakes and wetland complexes within the Bay planning area. (UAF 1999)"
69-46	it is essential that BLM acknowledge the impacts of climate change, the multiplier effect of other stressors, and explain its decision to emphasize mineral development in that context. (See, e.g., Arctic Climate Impact Assessment. p 106.) In order to protect wildlife populations, the Wildlife Society recommends reducing "nonclimate stressors on ecosystems." (Wildlife Society Technical Review 04-2. 2004. p 18.)	Impacts to wildlife from climate are discussed in Chapter IV. Please see the response to comment 69-37. If climate change continues to impact BLM-managed resources or use changes for a particular area is identified, then land management status will be re-evaluated and permitted activities will be adjusted accordingly. Adjustments to permitted activities may be made through the use of ROPs or seasonal restrictions to protect resources. Refer to Appendix A, Introduction.
22-1	I also feel that new information specifically relating to global warming has bearing on your analysis. It is unpractical to discuss subsistence and other land uses in light of drastic climatic and migration changes that can be attributed to global warming. These impact are not addressed in the RMP.	As understanding for the phenomena and its causal factors develops, it is likely that the issue will be addressed in project-specific environmental analysis. Please see the discussion on environmental change in Chapter III, section B.1.b. and throughout Chapter IV.

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69-41	Because permafrost underlies so much of Alaska, its thawing will have an important impact on ecosystems and activities on the BLM-managed lands. For instance, as the permafrost which underlies the Bay area's ponds and lakes thaws it allows surface water to drain underground. (Yoshikawa and Hinzman. 2003. Shrinking Thermokarst Ponds and Groundwater Dynamics in Discontinuous Permafrost near Council, Alaska. Permafrost Periglac. Process. 14: 151–160.) As a result, ponds and lakes may dry up. Although Dr. Hinzman's research has not focused on the Bristol Bay and Goodnews Bay watersheds, he suspects the same drying is generally taking place there.	Please see the response to comment 69-40.
69-43	Indeed, the plan's refusal to acknowledge climate change impacts the BLM's ability to address some very clear infrastructure issues immediately. For instance, climate change in the artic is resulting in increased run-off in glacially-fed rivers and more intense storm events. (Hinzman, et. al. 2005. pp 263-264, 258.) This suggests that culvert standards, which are essential for ensuring fish passage, need to be revised to provide for higher water flows.	Please see response to comment 69-37 and ROPs FW-2f, FW-2g, and FW-2h (Appendix A).
69-39	The Wildlife Society places the simple recognition "of global climate change as a factor in wildlife conservation" first in its list of recommendations for land managers working to protect wildlife in the face of climate change. (The Wildlife Society Technical Review 04-2. 2004. p 18.)	Please see the response to comment 69-37. Further, in Chapter III, section B.1.b the plan acknowledges the following: "There are likely to be changes in the range of vertebrate animals and changes in productivity of aquatic ecosystems (UAF 1999). As the boreal forest intrudes further north at the expense of tundra and shrub communities, there will be changes in habitats and the distribution and density of a number of wildlife species on land (UAF 1999)."
69-46	Mature conifer forests provide a variety of important ecosystem functions. White spruce forests, which are the most vulnerable to insects and disease, can be limiting habitat for some songbirds. Black spruce forests, which are most vulnerable to fires when mature, offer climatically optimal conditions for lichen growth because of slow plant succession and little competition from other plant forms. These lichens provide preferred forage for caribou in the winter, and as a result, the destruction of forage lichens by fire or mechanism may have an immediate effect on the winter range of caribou.5 (Matthews, Robin F. 1993. Cetraria islandica. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: http://www.fs.fed.us/database/feis/ [2006, September 4].)	Wildland fire management options recognize fire as an essential ecological process and natural change agent of many Alaskan ecosystems. Please refer to Chapter III, section B.8 for additional discussion concerning fire management. The importance of lichen is discussed in various section in Chapter III, including sections B.5.c and B.6.d.1.

Editorial

Letter-Comment#	Comment	Response
3-16	Page 2-8 Currently (2) Alternative A is separated out under Floodplains discussion, yet (3) Management Common to All Alternatives includes management under Alternative A. Please include some statement why (B) covers all alternatives, or combine the two paragraphs. Similarly, this occurs under Subsistence discussion on page 2-56.	In the FEIS, Floodplain management has been incorporated into Management Common to All Alternatives, Chapter II, section D.1.c.2.
1-7	Need specific mitigation actions in Chapter IV	The purpose of BLM's Resource Management Plans are to determine allowable uses, goals, objectives, and management actions. Chapter IV predicts potential effects to resources within the Bay planning area from implementation of the four proposed alternatives. Mitigation measures from specific activities are provided through the use of Required Operating Procedures, Stipulations, and Standard Lease Terms (Appendix A).
2-3	P. 3-292, Section III.E.1.b.1., Red Top Mine and Mill Site, first paragraph, fifth sentence: With a density of 13.6 grams per cubic centimeter, a quart of mercury would be expected to weigh about 28 pounds (rather than the reported 72 pounds), using, for example, the table at: http://www.allmeasures.com/formulae/static/materials/63/density.htm.	Thank you for pointing out this error. This change has been made within the FEIS.
5-3	Chapter I-Introduction Page 1-25 Please consider adding the Wood-Tikchik State Park Management Plan, ADNR, October 2002 to the list of related planning documents.	This plan will be added within the FEIS
5-10	**Page 2-35, In Table 2.8, Locatable Minerals, Alternative C,** To further clarify, we recommend moving the discussion regarding ANCSA 17(d)(1) withdrawals for these river segments to immediately follow the Exceptions associated with the proposed wild river segments it references.	The description of ANCSA 17(d)(1) withdrawals has been added to Chapter II, section A.
5-11	**Page 2-40, (5) Alternative C, (6) Alternative D** Add "water quality"	This edit has been made within the FEIS.
5-37	**Page 4-104, Recent Exploration and Development Activities Pebble Copper Area** Please note that the permitting for the Pebble project and the final (bankable) feasibility study will not be started until 2008.	Information regarding the proposed Pebble mine will be updated in Chapter IV of the FEIS.
5-39	**Appendix A Wild and Scenic River Eligibility Matrix:** We suggest including a section explaining the column in the spreadsheet entitled Class. We assume that Class refers to Wild, Scenic or Recreational but the footer associated with this column uses letter designations and the column in the table uses numbers. It is unclear as to which number corresponds to which letter. It may also help to include a paragraph that describes what constitutes a Recreational, Scenic, or Wild River.	The Wild and Scenic River Eligibility/Suitability determination has been revised and can be found in Appendix B in the FEIS. Your suggestion have been considered for this revision.

Letter-Comment#	Comment	Response
5-40	We suggest including additional information at the bottom of the summary analysis table that describes the relative importance of the numerical values associated with each planning block and attribute. While this information is adequately presented in the text on page A-2 including this in the table allows the table to stand alone if need be.	The Wild and Scenic River Eligibility/Suitability determination has been revised and can be found in Appendix B in the FEIS. Your suggestions have been considered for this revision.
5-41	**Table 1.2 Areas of Critical Environment Concern Nomination Matrix** We suggest including a footer that describes the numerical values applied to each attribute for relevance and importance for the various planning blocks. In other words, is a one better than a three? What does a one represent? This information would allow this table to stand alone. A description of the table could also be included in a concluding paragraph on page A-10 to provide further clarification.	The relevance and importance evaluation for ACEC determination has been revised and can be found in Appendix B in the FEIS. Your suggestions have been considered for this revision.
5-45	Chapter I-Introduction Page 1-15 Please note that there is orphaned header b)Subsistence	This edit will be made within the FEIS
5-46	Page 1-16 Please note that a reference to Table 1.1 in a sentence discussing specific rivers and streams appears to be inappropriately referenced, Please check.	This edit will be made within the FEIS
5-47	Chapter II-Alternatives Page 2-35, In Table 2.8, Locatable Minerals, Alternative C, Please check spelling for ANCSA.	This edit will be made within the FEIS
5-49	Pp. 2-94, 95: The title bar on the left hand side of the page is difficult to read. Aligning the text to read vertically or merging the title cell with the blank cell to the right may make it easier for the reader to understand the table.	Thank you for your suggestion, this change has been made within the FEIS.
5-52	Page 3-144, last sentence Please review this sentence. We believe "wildland" should be wildland fire suppression.	Thank you for your suggestion, this change has been made within the FEIS.
5-53	Page 3-164 5th paragraph Please review the second sentence. It should most likely read: "These define the visual objectives that BLM intends to achieve for its lands."	This edit will be made within the FEIS
5-54	Page 3-195, next to the last paragraph: Please review and edit the first two sentences. Should this not read: "Guided tourism for fishing and hunting during the peak season (June-September) in this region of Alaska is primarily limited by the number of accommodations and guides many of whom are booked years in advance."	This edit will be made within the FEIS
5-55	Page 3-213 -3-287 Lands and Realty It was difficult to work through this section and tie the appropriate text to the appropriate maps even though the information is well described and mapped.	Maps are placed together in a separate volume within the FEIS and in order as they are introduced.
5-58	Page 3-216 Trespass Abatement, last paragraph. Please review the first sentence and edit the last phrase: or sell (sale) of the land to the trespasser.	This edit will be made within the FEIS

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5-59	Chapter IV-Environmental Consequences Page 4-26, First line, trailing sentence. Please review the first line and edit.	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-60	Page 4-45, Effects to Wildlife from Recreation Management (Common to all)/ Page 4-45, Effects to Wildlife from Travel Management (Common to all)/ Page 4-46, Effects to Wildlife from Land and Realty Actions (Common to all) {note the inconsistencies in capitalization in the titles}	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-61	Page 4-78, Summary of Effects to Visual Resource Management (Alternative A)/Page 4-79, Summary of Effects to Visual Resource Management (Alternative B)/Page 4-80, Summary of Effects to Visual Resource Management of Alternative C/ Page 4-81, Effects of Visual Resource Management Summary of Alternative D/ We recommend a consistent topic heading, such as "Summary of Effects on____(Alternative___)."	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-62	Page 4-77 (3) Effects to VRM by OHV (Alt A) Please review and edit the second sentence in this section. "The numbers of OHV trails throughout the planning area may stay the same or increase slightly within the next ten years."	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-63	Page 4-85, Effects to Grazing from Fish and Wildlife Management (Common to All) Please review the last sentence in this section. "Insects from both standpoint of harassment and disease transmission may also require greater measures (of control, management?) to insure successful livestock grazing..."	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-64	Page 4-102. last sentence. Please review: 1) "non" should be "none" 2) "Interested" should be "Interest"	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
5-65	P. 4-115, Cumulative Effects to Subsistence to Subsistence. Please review and edit the first sentences (line two, would be the three most…)	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
3-3	As part of the cumulative effects analysis, the RMP/EIS should evaluate the past, present and reasonably foreseeable future actions associated with the Bay Planning Area. The geographic boundary for consideration of the reasonably foreseeable future actions should include areas within and adjacent to the greater Bristol Bay and Alaska Peninsula, as well as adjacent mineral districts. The Draft RMP/EIS identifies specific examples of reasonably foreseeable future actions. We recommend that the Final RMP/EIS include additional information regarding climate change effects on the region, as well as the proposed off-shore oil and gas leasing in the Bristol Bay, and proposed mineral development in areas adjacent to the planning area. Resource exploration and development will noticeably increase air and water transportation, and may cause the development of additional roads. This increased transportation will inevitably impact air and water quality.	Please see response to comment 22-1. Climate change has been addressed in Chapter IV of the FEIS.

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3-10	Page 1-4 Consider incorporating Native Corporations/ANCSA lands section into Private lands section (Page 1-5) since technically corporation lands are private lands. This will allow for consistency with definitions presented in Table 1-1.	Your suggestion will be incorporated within the FEIS.
3-11	Page 1-5 Bethel is not incorporated as a Borough but rather a second-class municipality. Please correct.	This edit was made within the FEIS
3-12	Page 1-5 In the text box, move creation of Wood-Tikchik State Park to fit in timeline, between ANCSA and Alaska National Interest Lands Conservation Act (ANILCA).	The text box in Chapter I, section c.2 describes the major congressional action which resulted in the land management of the region. See Alaska Statehood Act in text box. This edit will not be made within the FEIS
3-13	Page 1-6 In first paragraph, include statement about village corporations to complete discussion about ANCSA corporations in the planning area.	Your suggestion has been incorporated within the FEIS. See Chapter I, section C.2.
3-14	Throughout the document, several terms are used to define federally-recognized tribal governments. These terms should be standardized to reflect the appropriate legal definition, and to clearly distinguish tribal governments from physical communities/villages or state-chartered ANCSA corporations.	This edit will be made within the FEIS
15-2	We ask BLM to approve Alternative C, which keeps the lands closed to mining. We urge you to establish Areas of Critical Environmental Concern to protect these wild lands, keeping them closed to oil and gas drilling, mining, and any developments that would jeopardize the rich fish populations and terrestrial wildlife of Bristol Bay. The rivers should be protected with Wild and Scenic River status as proposed in Alternative C.	Thank you for your comment.
22-2	The excessive use of acronyms makes the RMP hard to understand for Non-BLM personnel.	Please see the Acronym and Abbreviation section in the Appendices.
22-7	Since the approval of the MFP in 1981 new regulations and policies have created additional considerations that affect the management of public lands. What are these regulations and policies? What are the new issues and concerns?	Please see Chapter I, section G.2 for policies, plans and programs that relate to management within the planning area, Purpose and Need, Chapter I section B, and Issues, Executive Summary, section D.
22-8	Which lands should/would be made available for oil and gas and hard rock mineral development and how should these lands be managed to sustain natural resources.	Land management strategies are summarized Chapter I, section F. ROPs, Stipulations, and Standard Lease Terms (Appendix A) will be applied to permitted activities to protect natural resources.
36-2	On behalf of the Native Village of Quinhagak the City of Quinhagak, Qanirtuuq, Inc., and the residents of Quinhagak we are requesting an extension for the public comment period for at least three more weeks in order to meet with BLM representatives.	Please see response to comment 6-1
55-1	Pg. vi,. Alternative D, line 11. CSU is not defined here or in the glossary.	Your suggestion will be incorporated within the FEIS.

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55-2	Pg. 2-33, c. 3-goals: "Maintain and enhance…" Insert and salable after locatable on second line.	This edit will be made within the FEIS
55-3	Pg. 2-36, Table at top of page. There are no column headings for the alternatives. It appears that either Alternative A or B is missing entirely.	This edit will be made within the FEIS
55-4	Pg. 3-157, Table 3.14. The dates in the date column should be listed consistently. Normally B.C. dates are written old to young such as 9500 -7000 B.C. and A.D. dates are also written older to younger such as 1000-1800 A.D.	This edit will be made within the FEIS
55-5	Pg. 3-162, 1st paragraph, 3rd line should read "resident seal population."	This edit will be made within the FEIS
55-6	Pg. 3-177, 1st paragraph, last line should read "the justification for exploration…"	This edit will be made within the FEIS
55-7	Pg. 3-177, (2) Local Dependence…, 2nd paragraph. 1st line should read "…. Area to date". Delete up.	This edit will be made within the FEIS
55-10	Pg. 3-182, 3rd paragraph, 7th line. Cretaceous is misspelled.	This edit will be made within the FEIS
55-15	Pg. 3-192-194, (5) Resource Allocation and (6) Mining Claims…sections. …that the section on mining claims should be labeled 6, not 5.	This edit will be made within the FEIS
55-17	Pg. 3-195, c) Salable Minerals…, 2nd paragraph, last line should read "…statewide and the trends indicate…"	This edit will be made within the FEIS
55-18	Pg. 3-214, ANCSA 17 (d) (1), 5th line should be rewritten. "…resources and assessment of values would (delete then) meet future public needs…)	This edit will be made within the FEIS
55-20	Pg. 4-2, 2nd paragraph, 2nd sentence. Spelling correction- "…adverse, and may result".	This edit will be made within the FEIS
55-21	Pg. 4-8, second solid bullet, 3rd sentence. Two should be changed to three.	This edit will be made within the FEIS
55-22	Pg. 4-8, (2) Locatable Minerals. The APMA is used to permit hard rock related exploration activities such as drilling. The APMA is not used to permit actual hard rock-related mining activities. We suggest that the end of the first sentence read "…for both placer mining and exploration for hard rock deposits".	This edit will be made within the FEIS
55-23	Pg. 4-9, 3rd bullet, last sentence. We suggest that this sentence be rewritten to "Hard rock exploration is up…largely due to the increasing price of metals and increased…"	This edit will be made within the FEIS
55-24	Pg. 4-9, 4th bullet. Delete has from first sentence. Reword the third sentence to read "near Goodnews Bay rather than "in Goodnews Bay".	This edit will be made within the FEIS
55-25	Pg. 4-9, last bullet re: the Pebble area. This paragraph is mostly speculation and does not reflect the current status of the Pebble project and should be rewritten. The Pebble project is currently in the advanced exploration phase. A bankable feasibility study has not yet been	Impacts to resources on BLM lands from development on adjacent lands are analyzed in Chapter IV, section E. This section has been revised from that offered in the DEIS. Your comment was taken into account.

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	completed. Therefore, the decision of whether or not to apply for permits to develop the deposit has not yet been made. Realistically, a ball park employment figure to fully staff an operating a mine at the Pebble prospect would be closer to 100 than 100. The construction phase could require a work force in excess of 2000. If it can be permitted, this project has the opportunity to provide these 1000 jobs for more than 50 years,	
55-26	Pg. 4-10, 1st bullet. This paragraph is difficult to follow and needs a rewrite. At the very least delete the extraneous "… occur activity would…" in line 6 and the "…activity would occur…" from line 9.	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
55-28	Pg. 4-19, (7) Effects to Soils.., 1st sentence. Change "…mining exploration…" to "mineral exploration…" Also, the statement made in the last sentence of this paragraph-"Current soil storage handling stipulations do not prevent damage to soil health and viability and this reduces the soil's capability to support vegetation."-is not accurate. This same statement is made elsewhere (see pg. 4-22, (3), paragraph 3). Such stipulations are part of the final permits and the State Dept. of Natural Resources has broad authority to require that specific steps be taken.	This edit will be made within the FEIS. Chapter IV has been considerably revised in the FEIS.
55-29	Pg. 4-23, last paragraph last sentence. "Indirect impacts caused.." This sentence duplicates the first sentence of the next page.	This edit will be made within the FEIS
55-31	Pg. B-14, Pebble Copper Mine Project. The description lists this as a "gold-copper-molybdenum-silver" deposit. Normally the most valuable metal in the deposit is named first. The deposit would better be classified as a copper-gold deposit. The jury is still out on how much of the molybdenum and silver are recoverable and whether they would contribute significantly to the economics of the property. Note also that is not a mine but rather an exploration project. Even if it can be permitted, it will be another five or more years before a two year long mine construction period could begin.	This edit will be made within the FEIS. The ANILCA 810 analysis in located in Appendix D in the FEIS.
69-23	As planning, exploration and potential future development of Pebble Mine and the Bristol Bay mining district pushes forward, BLM should adequately describe the cumulative impacts of potential future transportation infrastructure within the entire region, including the Bay planning area lands.	Your suggestion has been incorporated into the FEIS. See Chapter IV, section E.
69-28	BLM should clarify whether it will rely on RMP/EIS for future decisions—BLM must provide key stakeholders in the region with opportunities to provide analysis and input on any proposals for future resource development, or other activities that may damage resources or resource values in the planning area. This includes review of draft documents, such as Environmental Assessments.	43 CFR 1610.5-3(a) requires that "all future resource management authorizations and actions…shall conform to the approved plan." Before surface disturbing activities are approved, the BLM must prepare an environmental assessment (EA) or EIS, if necessary, of the potential effects of the proposed activity on the environment.

E. Index of Comment Letter Numbers

Below is a list of names of those who commented on the Bay Draft RMP/EIS and their assigned comment number. Also shown are the page numbers where responses to their specific comments can be found. Organizations and government entities are listed by the organization or the government agency rather than by the signature to the submission. Form letters and variations on form letters with no additional substantive comments were all given the same comment number, and are listed only once, rather than listing the names of all those who submitted the form letter.

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AK House of Representatives, Foster, Richard	073	No Substantive Comment
AK Inter-Tribal Council, Erlich, Ian	188	No Substantive Comment
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Alaska Miners Assoc., Inc. Borell, Steven	055	I-25, I 29-30, I-38, I-50, I-68, I-74-76
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Barton, Clint	161	No Substantive Comment
Bear, D., Mills, S., Wilson, V.	126	* No Substantive Comment
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Blumberg, Kurt	112	No Substantive Comment
Bonin, Betty	013	I-35
Bowen, Paul	089	No Substantive Comment
Braun, Steve	118	No Substantive Comment

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Claypool, Ra.	140	No Substantive Comment
Cleveland, Annie	177	No Substantive Comment
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Collins, John	129	No Substantive Comment
Curtis, Judith	111	No Substantive Comment
Damon, Doug	196	No Substantive Comment
Danford, Frank	120	No Substantive Comment
Doma family	150	No Substantive Comment
Dull Jr., Blinn	091	No Substantive Comment
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Garvey, Lydia	078	No Substantive Comment
Garvey, Lydia	117	No Substantive Comment
Garvin, Michael	096	No Substantive Comment
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Katanas, Elise	102	No Substantive Comment
Kathaber@aol.com	151	No Substantive Comment
Kazimirowicz, Sylvia	144	No Substantive Comment
Kley, Krystal Ten	123	No Substantive Comment
Kley, Reid Ten	119	No Substantive Comment
Knauber, R.	110	No Substantive Comment
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Lake Peninsula Borough, Smith Marvin CDC	074	No Substantive Comment
Lee, Gerard & Ambrose, Susan	107	No Substantive Comment
Lerch, Roy H.	127	No Substantive Comment
Lewis & Clark Trout Unlimited, Kustich, Jerry	054	I-38
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* Denotes a form letter with multiple signatures

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149	Faust, Nina & Bailey, Ed
150	Doma family
151	Kathaber@aol.com
152	Ganguli, Rajive
153	Hoekzema, Robert B.
154	Steitz, Martin
155	Wilmarth, David "Larry"
156	Hicks, Steve
157	Saurenmann, William
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203	Hearing- BLM Naknek, AK
204	Hearing- BLM Newhalen, AK
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