8.4 Draft EA Public Comment Analysis

A. Introduction

On March 23, 2010, the public comment period commenced for the Draft Environmental Assessment (EA) for the Delta River SRMA Plan and EARMP Amendment. Public comments were accepted until May 6, 2010 and could be submitted via email, U.S. Mail, in-person, or fax. A total of 68 comments were received during the public comment period. This appendix contains the actual text or transcription of all comments received during the comment period, with BLM responses to each comment. The BLM responses include how the comments were considered and addressed in the development of the alternatives and analysis of effects for the Final EA.

B. Content Analysis Process

A standardized content analysis process was conducted to analyze the public comments for the Draft EA. Each letter, email, or written testimony that was submitted in response to the comment period was considered a "comment," these comments were then parsed to extract individual themes or issues that could be grouped according to specific categories. Each comment was read by the planning team to ensure that all comments were identified and associated with the appropriate subject category, and then entered into a table to allow sorting based on the issue or subject. Comments are included verbatim as they were submitted by the public.

C. Responses to Individual Comments

Comment letters were assigned comment numbers when they were received; these numbers are used in the following table so reviewers can easily find their comment and how the BLM responded to each comment. Also shown are the page numbers where responses to specific comments can be found in the different categories throughout the table. Organizations and government entities are listed by the organization or agency, rather than by the signatory to the submission.

Name of Commentor	Comment #	Response Page #
Alaska Center for the Environment	01	154, 160, 167, 183, 184, 185, 188, 190
Alaska Miners Association, Inc	02	154, 186, 187, 206
Alaska Quiet Rights Coalition	03	154, 160, 167, 170, 171, 174, 178, 179, 180, 188, 213
Alaska Wilderness League	04	155, 161, 188, 198-201, 213-214
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Baring, Sharon	06	155, 161, 168, 188
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Bondy, Claude and Jennifer	08	155, 161, 182
Brown, Linda and Miller, Jon	09	156, 162, 168, 187, 190
Copper Country Alliance	10	151, 156, 162-163, 168, 170, 171, 172, 174, 178, 180, 183, 184, 186, 187, 188, 190, 201, 212, 214
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Hannah, Jim and Shirley	22	152, 157, 164, 176, 182, 183, 191
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Monetti, Karl	36	157, 165, 191
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Paxson Fish and Game Advisory Committee	39	153, 179, 184, 185, 189, 202, 211
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Pure Nickel Inc.	43	206-208
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Raynolds, Martha	48	158, 166, 170
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Rutledge, Linda	50	158, 166, 170, 190
Shaw, David	51	159, 166-167
Shine, Timothy	52	159, 179, 180, 215
Sierra Club Alaska Chapter	53	196, 205-206
St. Amand, Larry	54	215
State of Alaska, Citizen's Advisory Commission on Federal Areas	55	175-176, 184, 196, 202-203, 208-209, 211
State of Alaska, Department of Natural Resources	56	176, 192-195, 196-198, 201-202, 209-210, 211-212, 212-213
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Wright, Bette	66	182, 183, 190
Yarnell, Ron	67	159, 167, 170, 192
Zimmerman, Christopher	68	159, 179

COMMENT #	COMMENT	BLM RESPONSE
GENERAL TRAVEL MANAGEMENT		
10	There are many opportunities in the Copper Basin and adjoining regions to enjoy motorized recreation and motorized hunting and fishing (not all hunters and fishermen use motorized vehicles in their pursuits; not only are a number of them seeking a quieter, more natural experience, but their hunting success can be adversely affected if game is driven farther away from their access points by motorized vehicles; regarding the latter point, see p. 67). There are very few locations, however, where non-motorized recreationists and sportsmen can recreate free of the impacts and conflicts that can be created by motorized vehicle use. In this narrow, specially designated corridor the emphasis should be on non-motorized travel and the opportunity to enjoy a more natural, more primitive experience and environment. And of course, even more important than these social issues, responsibly managing ATV and other motorized use has the extremely significant benefit of reducing ecological and archaeological damage (see, e.g., pp. 51, 52, 65, 66, 76, 77, 78). We think it's telling that Outstandingly Remarkable Values ("ORVs") are being identified based on how the area was at the time of designation (p. 10). It's a virtual certainty that motorized vehicle use was much lower in 1980 than it is now, thirty years later. This very strongly suggests that motorized use should be managed at significantly lower levels than is being proposed in the DEA.	Please refer to comment #16 in this section regarding ANILCA access regulations. The effects of motorized uses are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
11	Motors, noise, and pollution are taking over the few places accessible to quiet, non-motorized travel. In order for the Delta River to remain Wild and Scenic, motorized traffic should not be allowed in any form beyond the first Tangle Lake.	Please refer to comment #16 in this section regarding ANILCA access regulations. The effects to noise caused by motorized travel for each alternative are discussed in the EA on pages 99-100.
16	The Tangle Lake area along with the entire Denali highway is one of the best bird watching areas in the state that is accessible by road. For this reason I must strongly protest the inclusion of any motorized recreation in this area as the two activities are mutually exclusive. I appreciate the fact that some people enjoy making a racket and whipping around on their toys, but it makes it impossible to enjoy the area for those of us that are looking for some peace and quiet. I think we can all agree that the noise made by these machines drives off any wildlife in the areas where they are operating. I have grown up in this state and it seems that those of us that don't want to try and enjoy nature in spite of the ATVs and snowmachines have to travel further and further afield. The motorized users already have parts of Hatcher Pass and are trying to get more here in the valley as well as other areas around the state. Tangle Lakes and the surrounding area is one of the last big areas that is easy to get to that you don't have to compete with motorized recreation. In addition I do not believe that the motorized activities will stop at the designated areas. I have witness many case of ATVers and snowmachiners jumping the borders of the motorized area and rampaging through the off limits area. In such a remote location I doubt that an enforcement office will be able to stop this from occurring in the areas covered by this proposal. Not only is this annoying, but it could damage the nesting grounds of the migratory bird life that uses the area in the summer months. I have no problem with motorized recreation in the winter being allowed in the area, but I strongly opposed it in the summer months over the delicate tundra. If motorized recreation ends up being allowed in the area please consider enforcement of rules as of primary concern.	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU) and as a component of the Wild and Scenic Rivers System. ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for subsistence uses and special access. ANILCA Section 811 states that the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Similarly, ANILCA Section 1110(a) provides that the Secretary shall permit the use of snowmachines, motorboats, airplanes and non-motorized surface transportation on CSUs in Alaska, subject to reasonable regulations. Unless these uses are found to be detrimental to the resource values of the area, the applicable methods of access shall not be restricted. Alternatives 2, 3 and 4 were developed with two Recreation Management Zones (RMZ 1 and 4) that would be managed for a nonmotorized setting prescription and nonmotorized recreational opportunities. ANILCA access provisions limit the closure of CSUs to certain modes of travel that have been historically used for subsistence purposes or traditional activities, unless these uses are found to be detrimental to the resource values of the area. The BLM would be required to first determine that motorized uses would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA Sections 811(b) and 111O(a). Such a finding requires the agency to follow

COMMENT #	COMMENT	BLM RESPONSE
		ANILCA closure procedures outlined in 43CFR36.11. After additional consideration, at this point in time, the current levels of motorized boating use and airplane landings in RMZs 1 and 4 do not warrant an ANILCA closure, although geography (low water, portages) does contribute to historically low levels of motorized boating use in these areas. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if motorized uses are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of use and impacts before implementing an ANILCA closure, if monitoring shows this is necessary in the future. OHV use within the river corridor in the Tangle Lakes and Denali Highway area is currently prohibited under BLM TLAD regulations. There are no designated OHV trails within this portion of the river corridor. This would only be changed under Alternative 3 with the designation of two additional OHV trails in this area. Otherwise, OHV use would be prohibited during the snow free months in RMZs 1, 2, 3, and 4, but allowed in RMZ 5 on two designated OHV trails (Rainy Creek and Top of the World Trails). The BLM is aware that unauthorized OHV trails have the potential to enter the river corridor as a result of unauthorized OHV use and has developed management actions to address this concern. Travel management actions for each RMZ in the EA include monitoring for unauthorized trails. The effects of motorized uses are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
18	I would like to request this area be kept as free of motorized vehicles and development as is possible. I've spent many a day enjoying it's peace and quiet, it's freedom from the trash and litter that accompanies vehicle access, the waste and destruction that follows on the heels of opening an area to development. Given the archaeological, paleontological, and natural beauty of the area I think it is well worth keeping as natural as possible. We have lost so much of the wonder that was once this country that I think it behooves us to preserve what is left before it, too, is given over to the ATV and bulldozer.	Please refer to comment #16 in this section regarding ANILCA access regulations. The effects of motorized uses are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
20	Please ensure all areas are open for multi-use purposes which included motorized access within the Delta Wild and Scenic River Management Plan. Motorized access is critical for Americans with disabilities to enjoy this area and for Alaskan to gather food resources.	All areas are open for multi-use purposes and all of the alternatives propose varying levels of motorized access. Alternative 3 has the most liberal motorized access proposals.
22	Subsistence activities, berry gathering and hunting should use traditional means to access the use areas, i.e. non motorized access.	Please refer to comment #16 in this section regarding ANILCA access regulations.
26	I would like to see this area protected as much as possible from motorized uses; there are plenty of places to go nearby and throughout Alaska for jetskis, airboats, and the like. Please preserve this area from excessive development and disturbance as possible.	Please refer to comment #16 in this section regarding ANILCA access regulations.

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38	I strongly feel that the number of people that have been visiting the river valley is fairly low in comparison to some of the numbers in this assessment. The majority of all of the motor boats that use the river due so for hunting purposes. This generally is from late August through September. During this time frame, the number of recreational floaters is extremely low. Those that are on the river during these times are doing the same thing as the motor boaters. They are hunting. BLM should not make regulations that favor one group over the other. The use of OHV is also extremely low. However, the top of the world trail did start getting more use roughly 5 years or so ago. This I feel is because Ft. Greeley closed a big section of land that the military personnel and Delta residence once recreated on. The majority of these OHV users were generally day riders and stayed out of the river corridor and their use is gradually falling back to the normal levels. As far a trail conditions go, the portion of the trail that parallels the Delta River is in excellent shape. Its use should have no impact on bank erosions. There are a couple of muddy braided spots on the top of the world trail. This is fairly common for any trails in Alaska. These muddy spots are a deterrent that helps keep the less experienced riders from coming into the valley.	The BLM utilizes several different methods to estimate visitor use levels on the Delta River. Sources include voluntary visitor registration kiosks, post use reports from commercial permittees, overflights of the river corridor on random days; traffic counters at developed facilities, visual observations, and river user surveys. We will continue to refine the methods used to estimate visitor use. We agree that the use of OHVs is relatively low, but we are also aware that current levels of OHV use have caused braiding and rutting on the Top of the World Trail as it descends into the river corridor. While these resource impacts may act as a deterrent to some OHV users, we cannot overlook the fact that these impacts may be adversely affecting soil quality, water quality, and vegetative resources, and that OHV management prescriptions are necessary to mitigate possible adverse impacts. The effects of OHV use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
39	The proposed motorized restrictions, (not consistent with the current navigability definition) in Zone 1, by possibly allowing some individuals to use motors, places the burden of proof of “traditional” on the individual. “Traditional” is not defined in ANILCA. The statement made by BLM personnel {at our meeting 4-14-2010} that “traditional” means prior to ANILCA has absolutely no basis in any written regulation or finding. “Traditional” needs a definition. Regulations need be a solid base on which individual users can rely. Allow motors for everyone, or for no one. Two classes of users cause a lot of grief; the guy from New York who paddles up and then has a jet boat pass him in an area he reads as non-motorized is not a happy camper. PAC believes in one class of user; make the regs consistent with ANILCA. Zone 1 motorized restrictions: PAC generally liked the concept, however the way this is written causes some heartburn. The word “may” used in the description of Zone 1 is unacceptable. Conceivably that would allow a “traditional” user access while a citation could be issued for his cousin from the city who is riding in the boat with him. We don’t want someone to have to call the Glennallen BLM office to be allowed motorized use in Zone 1. Who do they call on Sunday? PAC wants a solid regulation here.	Alternatives 2, 3 and 4 were developed with two Recreation Management Zones (RMZ 1 and 4) that would be managed for a nonmotorized setting prescription and nonmotorized recreational opportunities. ANILCA access provisions limit the closure of Conservation System Units to certain modes of travel that have been historically used for subsistence purposes or traditional activities, unless these uses are found to be detrimental to the resource values of the area. The BLM would be required to first determine that motorized boating and airplane landings would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA Sections 811(b) and 111O(a). Such a finding requires the agency to follow ANILCA closure procedures outlined in 43CFR36.11. After additional consideration, the BLM agrees that a traditional use determination would be needed to implement a seasonal closure, and at this point in time, the current level of motorized boating use and airplane landings do not warrant an ANILCA closure in RMZs 1 and 4. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if these uses are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of use and impacts before implementing an ANILCA closure, if monitoring shows this is necessary in the future.
45	I would like to express my concern about the proposal to allow powerboats and aircraft use on the Round Tangle Lake and Delta River. In particular the Wild and Scenic areas of the Delta River need to be preserved for non-motorized use only. I have floated sections of the Delta and fished in the Tangle Lakes. These are beautiful areas of Alaska that I would like to see protected from powerboats and aircraft.	Please refer to comment #16 in this section regarding ANILCA access regulations.

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47	In general, I favor restrictions on motors. There is no shortage of places in Alaska for outboards and ATVs; what the BLM offers in this locale is quality primitive recreation accessible by car without the restrictions of national parks. That is a rare commodity, and I'd like to see it protected. By all means do ban motors on the Upper Tangle River, specifically.	Please refer to comment #16 in this section regarding ANILCA access regulations.
62	Motorized vehicles should not be allowed in Zones 1 and 4.	Please refer to comment #16 in this section regarding ANILCA access regulations.
63	Hunting - my family chooses to go non-motorized hunting. We recognize this is not everyone's ethic, but it is ours. The Upper Tangles are one of the only places where you really can get away from the 4 wheelers and jet boats and Argos and all of those other "big boy toys". I'm not saying there is no place for motor supported hunting, I would just like to advocate for spaces where those of us who choose to go under human power have a place to do so. The lack of motor noise makes the Tangles particularly special.	OHV use in the Upper Tangles is already restricted within the river corridor under Tangle Lakes Archeological District (TLAD) Special Rules. There are no authorized OHV trails within the river corridor in the Upper Tangles area. Effects of motorized uses to natural quiet and natural sounds are discussed in the EA on pages 99-100.
65	Hi, I wanted to write in support of a very minimized motorized usage of the Tangle Lakes. I am a hiker, bicyclist, kayaker, and packrafter. The reason I love the Tangle Lakes area is that it has a relatively low human impact, therefore the wildlife is still abundant. The reason I live in Alaska is because it is NOT the lower 48, with motorized trails everywhere and jetskiis bombing around the lakes, and it's still possible to enjoy nature without the desctrutive impacts of human civilization. I feel very strongly that what makes the Delta "Wild & Scenic" is the low impact, so far, of motorized craft.	Please refer to comment #16 in this section regarding ANILCA access regulations.
OFF HIGHWAY VEHICLES (OHV)		
01	In alternative #3, BLM proposes to legalize motorized uses on trails that were previously closed. This encourages illegal poaching of trails and is a poor administrative choice that will only result in more illegal activity. We strongly discourage this kind of precedent being set on our public lands. Noise and damage to vegetation, soil, and water are common impacts from Off-Highway Vehicle (OHV) use; these are all impacts that would degrade the values of the corridor. With almost the entire Copper Basin open to recreational OHV use, it is reasonable to disallow such use throughout this narrow Wild and Scenic River corridor in snow-free months. Off-highway vehicle use for mining and subsistence purposes could be allowed on the Rainy Creek Trail. We are in favor of closing Top of the World/Yost Trail to motorized use, allowing access for mining and subsistence purposes only.	Decisions regarding OHV use that were developed in the EARMP are listed in the EA in Section 3.2.10.4.1 on page 77. Unless changed in this Land Use Plan Amendment, these decisions will continue to apply, including "...the future consideration of the development of motorized or nonmotorized trails..." as directed by the EARMP. The effects to noise, vegetation, soil, and water quality caused by OHV use for each alternative are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 107-108 (soil resources), pages 111-113 (vegetation), and pages 113-115 (water quality).
02	We understand that exceptions to the 2000 lb limitation on OHV weight "may be permitted on a case-by-case basis for access to active mining claims via the Rainy Creek Trail...." Additional access routes may be needed depending on mineral exploration results. Similar exceptions apply to uses of other approved routes. We recommend that language be used that will provide wider discretion for the BLM to approve other areas.	On page 60, the EA discusses the process for additional access routes within the DWSR corridor. The effects of authorizing additional access routes were discussed in the EA on pages 98-99.
03	Ideally, there would be no ATV use in this very special corridor. There are millions of acres of state and federal public domain land where their use is allowed with virtually no effective restrictions. We applaud BLM's proposal to close to motorized use, and attempt to rehabilitate, all of the motorized social trails in the corridor. And, although it's unfortunate that there are two designated subsistence and mining ATV trails there (Top of the World and Rainey Creek), we do not oppose their use, for these purposes only, by permit. Recreational motorized use on these trails should not be allowed.	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU). ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for subsistence uses and special access. ANILCA Section 811 states that the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Unless

COMMENT #	COMMENT	BLM RESPONSE
		the use of OHVs is found to be detrimental to the resource values of the area, OHV use for subsistence purposes shall not be restricted. At this point in time, the BLM believes that the current level of OHV use and associated impacts do not warrant an ANILCA closure to subsistence and/or recreational OHV use. The BLM does not believe that defining different types of OHV user groups, (i.e. recreational versus subsistence users) is compatible with providing a semiprimitive motorized recreational experience in areas that are targeted for motorized recreation. The effects to noise, soils, vegetation, and water quality caused by OHV use for each alternative are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 107-108 (soil resources), pages 111-113 (vegetation), and pages 113-115 (water quality).
04	In addition to this, we would suggest that the BLM review OHV uses for the Top of the World Trail and the Rainy Creek Trail. The cumulative impacts of climate change and recreation in the planning area may require stronger management guidelines, adaptive management and/or future closures/limitation on these trails to recreational OHV use if braiding, damages to vegetation and soils, erosion and scarring continue to be a problem or are exacerbated by decisions made in the EA.	The BLM will retain its authority to temporarily or permanently close trails if OHV use is causing unacceptable resource damages. The effects to recreation, vegetation, and soils caused by OHV use for each alternative are discussed in the EA on pages 107-108 (soil resources), pages 109-111 (travel management), and pages 111-113 (vegetation). We have also updated the effects analysis on pages 93-94 to consider the impacts on climate change for each alternative.
06	I am disheartened to learn that you are proposing an environmental assessment management plan for the Tangle Lakes and Delta Wild and Scenic River system that would support expanded motorized vehicle use in this area. As an annual user I have witnessed the damage to the tundra from ATV's on the south side of the highway during snow-free periods. I have appreciated the waterfowl and other wildlife and relative peace and quiet within this river system from my adventures on foot and by canoe. I do NOT support use of motorized off-road vehicles in this river system as I see such use as incompatible with the vision of a wild and scenic river and there are other opportunities for these vehicles elsewhere nearby.	Please refer to comment #03 in this section regarding OHV use and comment #1 regarding the development of additional motorized trails. The effects to noise and wildlife caused by OHV use for each alternative are discussed in the EA on pages 99-100 (natural quiet and natural sounds) and pages 117-119 (wildlife).
07	...almost the entire Glennallen BLM district is open to recreational OHV use, it is reasonable limit ORVs throughout this narrow Wild and Scenic River corridor in snow-free months.	Please refer to comment #03 in this section.
08	We enjoy the fact that this is one of the only campgrounds left that allows you to unload your atv's in the campground itself, for traveling to the various trails around. I will not visit campgrounds that don't allow you to take your wheelers off a trailer inside the park. We realize there are going to be people that mis-use this privilege, but don't feel everyone should suffer for the violations of a few. The numerous atv trails in the area are some of the best in the state, and we would not want to see any restriction going forward on using those trails.	All alternatives allow for the loading and unloading of OHVs in the campground. OHV use would be allowed for ingress and egress to the developed facilities on gravel travel routes designated for motorized travel. This would still provide for access to OHV trails in the area.
09	We also think that BLM should ban any off-road vehicles within the river corridor. Clearly these vehicles have a devastating impact on vegetation, and wildlife as we have personally seen in areas such as the Chena River Recreation Area. Moreover, like motorized water craft, the noise impacts must be considered to be in conflict with the semi-wilderness experience that is the draw of the Delta corridor for most users.	Please refer to comment #03 in this section. The effects to noise, vegetation and wildlife caused by OHV use for each alternative are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 111-113 (vegetation), and pages 117-119 (wildlife).

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10	Ideally, in order to protect the corridor's natural, primitive character to the greatest extent possible, ATVs should not be allowed anywhere in the corridor. Consequently, we commend BLM for its proposal to prohibit the use of social trails and to restore the damage they've already caused. And although, in the abstract, we would definitely prefer to see no designated trails, we can support the two designated trails because of the need to provide, by permit, motorized access for subsistence and mining—but there is no need for recreational ATV use of those trails and they should be closed to that activity. Additionally, both of those trails should be managed to minimize additional damage to the greatest extent possible. We were happy to see the rest of the area proposed to be closed to ATV use. We're unclear, however, about the proposal to allow ATV use for ingress and egress in the campground; once leaving the campground, is it legal to ride ATVs (unless licensed) on the highway? Incidentally, the proposed prohibition on non-ingress or egress use of ATVs in the campground definitely needs to apply to the campground host; in our experience, the host can be the worst offender, making frequent disturbing trips around the campground on an ATV.	Please refer to comment #03 in this section. The use of OHVs in the Denali Highway corridor is under the jurisdiction of the State of Alaska, Department of Transportation and Public Works.
13	I would also ask the BLM to ban ATVs within the river corridor because they are extremely destructive to the vegetation, soil, water and archeological sites. In addition, the noise disrupts wildlife and other users. My family and I enjoy spending time together in this area and I fear the continued degradation of the area will change it from a place to get away to into a place to get away from.	Please refer to comment #03 in this section. The effects to archaeological sites, noise, vegetation, soil, and water caused by OHV use for each alternative are discussed in the EA on pages 94-96 (cultural resources), pages 99-100 (natural quiet and natural sounds), pages 107-108 (soil resources), pages 111-113 (vegetation), and pages 113-115 (water quality).
14	OHV use should be prohibited in the wild and scenic river corridor during the snow-free months. They are loud, stinky, and have impacts on the land.	Please refer to comment #03 in this section. The effects to noise caused by OHV use for each alternative are discussed in the EA on pages 99-100.
15	A majority of all users felt that BLM should improve OHV trails to minimize places with unacceptable impacts using geoblock, planking, and water bars.	Please refer to page 38 of the EA for trail maintenance prescriptions. Trail maintenance activities may include the use of geoblock, planking, and waterbars, depending on the location and effectiveness of these methods.
17	I would like to see no change from the current plan. If anything, I would like to see expanded Off Highway Vehicle access and opportunity.	Alternative 1 would not change management from the current 1983 Delta River Management Plan. Alternative 3 provides for the creation of four additional OHV trails within the river corridor.
21	*Top of the World Trail.* I support any trail improvements/maintenance required to make this a sustainable and usable ATV trail to access the Delta corridor. I would like to see these maintenance activities aimed at reducing braided sections of trail thus reducing visual impacts to river users, reducing vegetation and soil impacts and reducing user conflicts. I do not believe that this trail has a detrimental impact to the non-motorized through floater. The use is centralized around the river crossing area. *South Landmark Gap Trail.* The South Landmark Gap Trail is a designated OHV trail within the TLAD. I have concerns about this trail "growing" and extending into Tangle Lakes Zone 1; a zone which is managed for a non motorized experience and will thus attract users with the highest sensitivity levels to motorized use. This brings into conflict users of the non-consumptive and consumptive genres which, as stated on page 57, tend to value different recreational experiences. I recognize that the main time that South Landmark Gap trail is used is during hunting season, which is not a heavy time for recreational use of Zone 1 but the visual impacts of an ATV in a primitive zone as well as the impacts to those hunters looking for a remote, primitive hunting experience would be greatly impacted by the introduction of another, motorized, access point into the deep Upper Tangle Lakes. As stated on page 101, "The demand for recreational use of public lands will likely increase." And "demand for OHV trails will likely increase. The use of OHVs for recreational purposes will increase." I am concerned that the recreational OHV user will	As a designated OHV trail, The Top of the World trail would be prioritized for OHV trail maintenance activities, as discussed in the EA on page 38. Regarding the South Landmark Gap Trail, page 19 of the EA specifies management actions that include monitoring for unauthorized trails. The effects of unauthorized trail use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).

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	become a more prominent user of the area. They are more likely to be using the area during the summer months. Their use could easily extend South Landmark Gap Trail and once a trail is there, subsistence users and hunters will use it. "Where does this trail go?" It is the natural progression. I believe that the possibility of this infringement should be clearly stated in the plan and a monitoring/action plan outlined to address and prevent any impacts to Tangle Lakes Zone 1 from this motorized ATV trail. Both recreational and subsistence activities need to be part of the monitoring plan. The introduction of motorized use in Zone 1 would reduce the diversity of experiences available in the area.	
22	ATV/ORV should be controlled and access restricted in the river corridor.	Currently, there are restrictions on OHV use that were developed in the EARMP. These decisions are listed in the EA in Section 3.2.10.4.1 on page 77. Additional restrictions have been proposed in Alternatives 2 and 4 of the EA.
25	...off road vehicles (ORV) should be required to stay on designated trails.	Alternatives 2 and 4 would require OHV users to stay on designated trails. Alternative 3 allows for travel off designated trails for game retrieval only.
30	Ban the use of jetskis, hovercraft, and airboats. These simply have no place in this setting and will also likely damage riparian habitats. There are plenty of other places where people can go and play. Same with ORV's, except for subsistence activities.	Please refer to comment #03 in this section. The effects of OHV use to riparian habitats are discussed in the EA on pages 96-98 (fisheries), pages 107-108 (soil resources), pages 111-113 (vegetation), and pages 113-115 (water quality).
31	I do not support...OHV travel. I hope you can get a good trail crew to help repair some of the resource damage caused by OHV's.	Please refer to comment #03 in this section. The effects of OHV use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife). Please refer to page 38 of the EA for trail maintenance prescriptions.
32	Recreational use of Off-Highway Vehicles (OHVs) should be prohibited throughout the corridor during snow-free months. With almost the entire Glennallen BLM district open to recreational OHV use, it is reasonable to disallow such use throughout this narrow Wild and Scenic River corridor in snow-free months.	Please refer to comment #03 in this section.
36	I urge you to...limit off road vehicles to subsistence use only within the corridor...	Please refer to comment #03 in this section.
40	...motorized craft and vehicles (e.g. ORV/ATV's) have no place within the Wild and Scenic River corridor and should be expressly prohibited. There is a serious problem in addressing the access to mining claims on the west of the corridor. I am greatly saddened by the pioneer road crossing the river and running on the west bank. While I realize that access is important, a road along the bank is not acceptable. Some method of allowing legitimate access while mitigating the intrusion and impacts associated with such access must be examined.	Please refer to comment #03 in this section. The decision to authorize the construction of the Rainy Creek Trail is discussed in the EA on page 74. On page 60, the process for authorizing travel routes that are necessary to access mining claims within or adjacent to the DWSR corridor is discussed. The effects of authorizing additional access routes are discussed in the EA on pages 98-99.
41	Your Alternative #3 proposals for OHV use in Zones #4 and #5 seem reasonable.	Thank you for your comment.
44	OHV use must be seriously considered. ATV's have the capability of penetrating the Delta River Corridor and perhaps already are. Serious planning should be made to select certain access trails and limit ATV use to just those trails. These trails should not descend right to the river's edge but terminate some distance away. This will preserve the scenic beauty of the river and allow foot access down into the actual river channel.	Alternatives 2 and 4 would require OHV users to stay on designated trails. Alternative 4 would require OHV users to park out of sight of the river. The effects of OHV use on scenic resources are discussed in the EA on pages 105-107.

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46	OHVs should not be allowed to drive off designed trails and the building of new OHVs trails should be prohibited in throughout the Delta Wild and Scenic River Corridor. The use of off-road vehicles is widely distributed in the RMZs and if there is not a limit we will begin to see the quality of wilderness and wildlife habitat drop significantly. The proposed alternative closes the unauthorized OHV trails to protect fish and wildlife. I support this very much.	Alternatives 2 and 4 do not allow travel off designated trails or the creation of new OHV trails. OHV use within the river corridor in the Tangle Lakes and Denali Highway area is currently prohibited under BLM TLAD regulations. There are no designated OHV trails within this portion of the river corridor. This would only be changed under Alternative 3 with the designation of two additional OHV trails in this area in the river corridor. Otherwise, OHV use would be prohibited during the snow free months in RMZs 1, 2, 3, and 4, but allowed in RMZ 5 on two designated OHV trails (Rainy Creek and Top of the World Trails). The effects to fisheries, wilderness characteristics and wildlife habitat caused by OHV use are discussed in the EA on pages 96-98 (fisheries), pages 115-116 (wilderness characteristics), and pages 117-119 (wildlife).
48	The use of four-wheelers (and off-road trucks) also needs to be regulated. These may be useful for subsistence hunting, but should be limited to specific trails where their damage can be minimized and ameliorated. This type of regulation and management is necessary in an area that gets so many different types of users. Only by preserving the underlying natural resources will there be similar opportunities for future generations to manage and enjoy this area the way we could in our lifetimes.	Currently, there are restrictions on OHV use that were developed in the EARMP. These decisions are listed in the EA in Section 3.2.10.4.1 on page 77. Additional restrictions have been proposed in Alternatives 2 and 4 of the EA, including the requirement to stay on designated trails. The effects of OHV use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
49	The use of OHVs should not be allowed anywhere in the area, including the campground and Zone 3. Their noise, and the inevitability of their being used on trails where they are inappropriate demands an outright prohibition on their use in the whole of the Wild and Scenic and Recreational areas, for the preservation of the wild and scenic character. The rest of the Denali Highway and the surrounding lands have no restrictions whatsoever on the use of OHVs, with widespread, obvious, and worsening habitat deterioration as a result. Allowing ever expanding OHV use will create ever increasing habitat degradation, damage to archaeological resources and over time damage fish and wildlife populations. Placing restrictions on their use sooner rather than later is the only way to begin to step out of a deepening trend of habitat degradation.	Please refer to comment #03 in this section. The effects to archaeological sites, fisheries, noise, and wildlife caused by OHV use for each alternative are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), and pages 117-119 (wildlife).
50	Off highway vehicles pretty much have access to the entire Copper River Basin. Restrictions are few. In the Delta Wild and Scenic River Area OHV use should be disallowed in the snow free months. OHV use for mining and subsistence hunting could be allowed on Rainy Creek Trail.	Please refer to comment #03 in this section. The effects of OHV use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).

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51	OHV's should be prohibited in the Wild and Scenic River corridor during the snow-free months. Presence of tracks, noise and fumes would greatly degrade the values that make the Delta River wild and scenic. The Tangle Lakes and Delta River are among my favorite parts of Alaska. I travel to the area several times during each summer to photograph, backpack, paddle, fish, hike, go birding, and explore. I have paddled the lengths of most of the lakes and the wild character of the land and water is what makes the region so appealing. I dread the impacts on the lakes and rivers that the current preferred alternative would create, and the overall change in the character of the place. I strongly encourage the BLM to continue to manage Tangle Lakes and the Delta Wild and Scenic River for low impact uses.	Please refer to comment #03 in this section. The effects to noise and scenic resources caused by OHV use are discussed in the EA on pages 99-100 (natural quiet and natural sounds) and pages 105-107 (scenic resources).
52	With regard to off road vehicle use, designate any and all trails as "open" for personal consumptive use. If restrictions are deemed absolutely necessary for preservation of a trail's usefulness, they should be based on ground pressure (pounds per square inch of contact) rather than on an arbitrary total size or weight figure. Small atv's with wheels cause much more damage to the land than larger ones with "soft" tracks.	It is difficult to generalize the impacts of "standard" 4-wheelers vs. tracked vehicles. Impacts to vegetation and soils from OHV use (including tracked rigs) varies widely based on soil and vegetation types. Concerns with tracked rigs often revolve around the width of trail they create, particularly through black spruce vegetation, and the subsequent development of road-like trails as a result. The effects of OHV use are discussed in the EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
57	Lastly, I would advocate that Recreational Off-Highway Vehicles (OHVs) should be excluded from all parts of the river corridor because of the impact from OHVs to vegetation, soils, water, and wildlife, and the noise impacts...	Please refer to comment #03 in this section. The effects to noise, vegetation, soil, water and wildlife caused by OHV use are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 107-108 (soil resources), pages 111-113 (vegetation), pages 113-115 (water quality), and pages 117-119 (wildlife).
60	OHVs create air pollution and permanent destruction of the habitat they cover. None of these polluting craft are consistent with maintaining the current relatively unspoiled region.	The effects to vegetation, soil, water and wildlife caused by OHV use are discussed in the EA on pages 111-113 (vegetation), pages 107-108 (soil resources), pages 113-115 (water quality), and pages 117-119 (wildlife).
67	Except for subsistence use, all OHV use should be banned from with the corridor. If OHV use is continued to be allowed it should be limited to only the Yost, Rainy Creek and Top of the World trails. Under these circumstances, impacts upon the environment, wildlife and non-motorized recreational users should be monitored and restrictions put in place to eliminate these impacts & conflicts.	Please refer to comment #03 in this section. The effects to recreational users and wildlife caused by OHV use are discussed in the EA on pages 109-111 (travel management) and pages 117-119 (wildlife).
68	I also disagree with the ORV use restrictions contained in BLM's proposed alternative. Again, the Bureau seems to be valuing one user group's comments above the others. As I noted in my comments during the scoping process, many of the proposals regarding "management" are simply over reaching over regulation. The volume of use in the river valley is not such that these regulations are necessary. Many of the desired goals can be accomplished through education rather than regulation. Not cutting live trees and properly disposing of waste are primary examples. Courteousness between motorized and non motorized users is also an example. The importance of not establishing new ORV trails is a further example.	The alternatives were developed to provide a wide range of management actions for OHV use within the river corridor.

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	MOTORIZED BOATING	
01	Jetskis, hovercraft, and airboats are not only detrimental to the river ecosystem but are also extremely noisy and should not be allowed in any zone of the Delta Wild & Scenic River system. All motor craft should be prohibited from Tangle River between the Wayside and the Campground. Powerboat use...should be limited to Round Tangle Lake. On Round Tangle Lake, boat motors should be limited to 15 horsepower.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
03	**Jet skis, airboats, and hovercraft.** These types of watercraft are EXTREMELY noisy and irritating, and they can, and of course too often do, because of their particular technical capabilities, seriously harm, both mechanically and because of pollution, lake- and river-side vegetation/habitat and the fish and wildlife that depend on that habitat. Their use should not be allowed anywhere in the corridor. Recreational powerboats should be allowed only on Round Tangle (campground users will recognize that there will be somewhat more noise here than in other areas), with a 15 horsepower limit (BLM's present recommended limit). This 15 hp limit should be maintained for subsistence use as well on the lakes, should exceptions be made there for big game subsistence hunting (although it is entirely possible to have a successful subsistence hunt, including transporting the game, on the lakes by non-motorized canoe). Zone 4, and the entire Wild section of the river (surely "wild" should mean something), should be non-motorized for all purposes. Powerboats could be allowed for subsistence purposes only in Zone 5, with motors no more powerful than is necessary for safety. Finally, the small Tangle River reach between the wayside and where it empties into Round Tangle should be closed to all powerboat use now—not after a problem develops. BLM recognizes that areas that now seem impracticable for motorized use could become routinely useable with "improvements" in technology. It is foolhardy to wait until that happens to try to close this beautiful little fly fishing spot to an inappropriate and unnecessary use.	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU) and as a component of the Wild and Scenic Rivers System. ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for subsistence uses and special access. ANILCA Section 811 states that the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Similarly, ANILCA Section 1110(a) provides that the Secretary shall permit the use of snowmachines, motorboats, airplanes and non-motorized surface transportation on CSUs in Alaska, subject to reasonable regulation. Unless motorized boating is found to be detrimental to the resource values of the area, motorized boating shall not be restricted. Alternatives 2, 3 and 4 were developed with two Recreation Management Zones (RMZ 1 and 4) that would be managed for a nonmotorized setting prescription and nonmotorized recreational opportunities, with targeted setting character conditions that are primitive (RMZ 4) and semiprimitive nonmotorized (RMZ 1). In RMZs 2 and 5, motorized uses are common and these areas have been targeted for a semiprimitive motorized experience. ANILCA access provisions limit the closure of CSUs to motorized boating activities that have been historically used for subsistence purposes or traditional activities, unless these uses are found to be detrimental to the resource values of the area. The BLM would be required to first determine that motorized boating would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA Sections 811(b) and 111O(a). Such a finding requires the agency to follow ANILCA closure procedures outlined in 43CFR36.11. After additional consideration, at this point in time, the current level of motorized boating use in RMZs 1 and 4 does not warrant an ANILCA closure, although geography (low water, portages) does contribute to historically low levels of motorized boating use in these areas. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if these uses are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of motorized boating use and impacts before implementing an

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		ANILCA closure, if monitoring shows this is necessary in the future. Alternative 4 will still be analyzed to display the effects of prohibiting the use of jetskis, hovercraft and airboats within RMZ's 1, 2, 4, and 5 and prohibiting all recreational motorized boating in RMZs 1 and 4, even though these limitations would still be subject to the ANILCA closure procedures and resource degradation requirements specified above. The BLM will modify Alternative 4 to include a prohibition on all motorized watercraft use in RMZ 3 (Tangle River between the wayside and campground) and to limit motorized boating to 15 horsepower motors within RMZ s 1 and 2, which would include Round Tangle Lake. The BLM believes that the 65 horsepower limitation for RMZ 5 is appropriate to ensure that users have enough power to safely negotiate the braided Delta River floodplain, and that recreational motorized boating is consistent with the targeted semiprimitive motorized recreational experience for RMZ 5. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
04	Under existing management, the BLM has recommended limitations for horsepower ranges of motorized boats. However, the Delta EA preferred management alternative fails to recommend or adopt limitations for power boating. We support a limitation of 15 Hp in the motorized portions of the river and hope that the BLM will not lose a strong existing management option.	Please see response to comment # 03 in this section.
06	...small-engined outboard motor boats would be acceptable, if they were restricted to the main Round Tangle Lake, or used for subsistence only.	Please see response to comment # 03 in this section.
07	I urge you to limit powerboat use...to Round Tangle Lake and to limit boat motors to less than 15 horse power. Additionally jetskis, hovercrafts and, especially, airboats should not be allowed in the Delta Wild & Scenic River system. This area should be managed as a wild and scenic area, not a play ground.	Please see response to comment # 03 in this section.
08	As far as boating, I'm all for allowing motorized boats in the area, but would be hesitant to advocate for high powered boats and jetski's. This is one of the few area's left where a person very old or very young can still get out and see area's where they don't have the physical ability to hike. We are saddened by seeing so many 'walking' or 'no motorized vehicle' area's, as you are singling out an entire segment of the population by doing so.	In regards to motorized boating, the alternatives were developed to provide a reasonable range of potential management actions. Alternative 4 is the most restrictive, prohibiting high powered boats (greater than 65 horsepower), hovercraft, airboats, and jetskis in RMZ's 1, 2, 4, and 5. Alternatives 1 and 3 do not propose any formal motorized boating restrictions. Alternative 2 will be modified to propose restrictions on motorized boating based on monitoring data for specific resource values in RMZs 1 and 4. The BLM will also modify Alternative 4 to include a prohibition on all motorized watercraft use in RMZ 3 (Tangle River between the wayside and campground) and to limit motorized boating to 15 horsepower motors within RMZs 1 and 2, which would include Round Tangle Lake.

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09	We have enjoyed paddling by canoe through the Tangle Lakes and Delta River Scenic River area for many years. Over the last 20 years or so, we have made the trip from Tangle Lakes to a take-out near Michael Creek too many times to count. Over time, we have come to view with dismay the degradation of the corridor that has occurred from the introduction of more and more motorized watercraft. As you move forward with the Environmental Assessment (EA) for the area, we urge you to ban jetskis, hovercraft and airboats in the river corridor! In our experience many of these craft are very inconsiderate of non-motorized users and the noise has so impacted our own experience that we have not visited the area for the past several years. Moreover, it certainly seems clear that there is also potential to damage water quality and to disrupt wildlife which is, of course, even more sensitive than humans to the noise. Since it is the paddler's hope to see wildlife and migrating birds, and since the area is known as a "scenic" river corridor, we think it is important that BLM limit powerboats...to Round Tangle Lake, and limit boat motors to some low horsepower. 15 horsepower would be a good upper limit since this size engine is appropriately slow and quiet.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
10	Banning motorized use seasonally (June and July) in Zones 1 and 4 would admittedly be a positive step, but it doesn't go nearly far enough. There are countless areas in the region where powerboats can be used; powerboat use in Zones 1-4, and the Wild section of Zone 5, should be limited to Round Tangle, with a 15 horsepower maximum. Round Tangle is adjacent to the developed campground, where a somewhat greater level of noise would be expected. Use levels should not be allowed to increase significantly, however; these levels could perhaps be monitored by the campground host. Requiring newer engine technologies (e.g., four-stroke, direct injection) is one of the actions BLM could take if engine pollutants show up in water sampling. BLM's current recommended horsepower limit is15 horsepower (p. 72; this appears to be for the lakes). This is a very good recommendation, and should be a mandatory maximum (the sole exception would be the Recreational section of Zone 5; see below); why BLM seems to be ignoring it now is puzzling. 15 hp is entirely adequate for both recreational and subsistence purposes; human-powered canoes, for example, have been, and still can be, used for hunting, including the transport of the game, on the lakes. 65 horsepower, the proposed maximum for Zones 2-5 in Alternative 4, as well as the 35 hp maximum proposed for Zone 1, is way more power than is needed in most of this area (see, e.g., http://smalloutboards.com/choose.htm). We should explain why we aren't supporting the use of powerboats (except in part of Zone 5; see below) for subsistence big game hunting elsewhere in the corridor. First of all, they're not necessary (see immediately above). Secondly, this subsistence opportunity (that is, by powerboat in the corridor) is far from the only one in the region; a vast area off of the Denali and Richardson highways is accessible for big game hunting, and is presumably one that far more people take advantage of. Thirdly, an exception for subsistence hunting would be difficult to enforce since every boater with a weapon would on the face of it appear likely to be a subsistence hunter. Fourthly, most of August, a beautiful time of year to be paddling on the lakes and other parts of the corridor, would be motorized. And, finally, making most of the corridor non-motorized would provide one of the few opportunities available for the not insignificant number of hunters who are seeking a more natural, quieter hunting experience. A Wild and Scenic River corridor would seem to be an ideal location for the provision of such an experience. The Recreational section of Zone 5 is the only other place in the corridor where we can support powerboat use, by permit, for either mining or subsistence big game hunting, but not for recreational use; a 65 hp maximum, or a lower limit that would still allow boats to be operated safely, should be required. This does create a significant safety issue, however, for paddlers; this problem needs to be thoughtfully evaluated and resolved in order to protect paddlers from wakes, capsizing, and collisions with powerboats. It is hard to understand why all motor craft would not be prohibited from the Tangle River between the Wayside and where it flows into Round Tangle. Sooner or later, some motor craft will be capable of operating in that short, beautiful river (BLM has recognized in a number of places in the DEA that	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).

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	technological "advancements" are possible, "leading to increased access in areas that are currently limited by shallow water and natural barriers" (see, e.g., p.93); we would say such advancements are likely, if not inevitable), and waiting for that to happen (as BLM suggests) is unwise. Harlequin ducks, grayling, and fishermen should not have to contend with motor craft. Jet skis, airboats, and hovercraft are exceptionally noisy, obtrusive vehicles (not only because of their decibel level but, often, because of their highly irritating changes in pitch), and they can do significant damage to waterfowl and to fish in vegetative cover, and to their riparian and lacustrine habitat. They should be banned throughout the corridor; they are totally inconsistent with its natural, wild character. Even in Alternative 4, jet skis are proposed to be banned only in Zone 2 (banning recreational boating is not necessarily a ban on jet skis, since they can be used for subsistence purposes). Airboats and hovercraft would be banned in Zones 1, 2, 4 and 5 in Alternative 4; we would applaud such a ban, in conjunction with a ban on jet skis, if it were instead in the Alternative that BLM is likely to adopt. Why it isn't in the Preferred, when there are few if any good reasons for allowing these three craft to be used in this protected area, and many reasons why they should be banned (including, in the Preferred, the general availability of other motorized watercraft), is unclear. And if nesting waterfowl in Zones 1 and 4 would potentially benefit from the Alternative 2 June and July closures to motorized boating and airplane landings (p. 99), they would surely benefit from a total closure to jet skis, airboats and hovercraft; this of course would also be true in Zone 2 (and perhaps Zone 5). Loons are particularly sensitive to disturbance and could make a good indicator species for how well wildlife in the corridor is being protected. We encourage you to conduct loon surveys at least annually on all the lakes. Our organization has worked since 2000 to protect the Eastern Denali Highway area from mineral exploration and large-scale industrial mining. This effort has taken up a huge amount time on the part of our members and many other individuals and organizations that care about the region and its wildlife. We always include exploration and mining noise as one of the unacceptable impacts. If BLM allows high noise levels from recreational boating, you weaken our case, and thus you fail to help protect the Wild and Scenic River corridor from the other effects of mining.	
13	I would also ask BLM to ban jetskis, hovercraft and airboats in the river corridor because of the noise, air and water pollution that would impact wildlife, fish, and other users. I would prefer a ban on motorboats as well, but if this is not possible, then please limit boat motors to 15 HP and limit powerboats...to Round Tangle Lake.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
14	All motorized vehicles should be limited to 35hp instead of 65hp and jetskis, hovercraft and airboats shouldn't be allowed in any zone. They are very noisy and disturb the solitude of the Wild and Scenic River corridor. For future reference, it should say no motorized craft in Tangle Lakes between the wayside and the campground. There is a lot of waterfowl in this area that would be disturbed if that should happen.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
15	I have canoed across the Delta river below Black rapids on a day trip and it became an overnight trip because of flooding and my inexperience. On are trip back we almost did not make it. The only experienced user would have been in a power boat to rescue us. I don't think you should restrict power boats on lower Delta river as their positive out way the negative.	The only alternative that proposes limitations on motorized boating use on the lower river is Alternative 4, where it would be limited to 65 horsepower motors. Alternatives 1, 2 and 3 do not propose any motorized boating limitations in RMZ 5, which constitutes the lower river portion of the river corridor.
21	I support a ban of all airboats, hovercraft and personal watercraft on all stretches of the Delta System, although their use in Zone 5 I could find acceptable since it is traditionally a more motorized segment of the river. With page 73 stating that 59% of motorized users and 91% of non motorized users support restrictions on personal watercraft and hovercraft. Noise is also mentioned as a reason non-motorized users would like to see use of these craft limited. Page 84 discussed the effects of the alternatives on Natural Quiet and Natural Sounds. This point to alternative 4 as being the most beneficial to the natural	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).

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	quiet of the area and this is the only alternative that mentions limits on airboat, hovercraft and personal watercraft use. I find it interesting that the BLM has decided to talk about chainsaw use through its own category for each alternative and zone but fails to give the even more intrusive sounds of airboats, hovercraft, and personal watercraft the same weight. With the loud noise that an airboat emits, it would easily impact the quiet experience of a user in Zone 1 when being operated in Zone 2. The effects alternatives shown on page 94 speak to the loss of a diversity of recreational experience that may be felt by some users because of the limitation of airboat, hovercraft, and personal water craft use in Alternative 4. I would like to challenge the BLM to take a broader look at "diversity of recreational experiences." The restriction of airboats, hovercraft, and personal watercraft is only within the Delta NWSRR Corridor. People wishing to use these modes of transportation can still enjoy their use on other rivers and lakes in the area. The BLM itself allows their use on the Gulkana NWSR. Is the BLM required to provide a variety of recreational opportunities at every site it manages or to allow for that diversity to unfold across the landscape and even across land management agency boundaries? I feel the Delta NWSRR system is a unique opportunity. The use of these craft are currently a VERY small percentage of the use of the area as stated on page 72 that only 3% of motorized users were airboat users according the Delta River Survey. Through their restriction the BLM would be showing the users of the Delta that they are committed to maintaining the current recreational opportunities that dominate the area. These craft are not even established uses within the corridor and therefore their elimination has no bearing on subsistence. Page 116 "Airboats and hovercraft are not established use within the corridor. Airboats have rarely been observed and hovercrafts have never been observed on the river or lakes." I support the limitation of motorized boating in zones 1 and 4 for the months of June and July. I would like to propose that the limitation on motorized boating in Zone 1 be extended to include August. This would provide a more extensive diversity of recreational experiences in an area that traditionally has very little motorized boating. Again, the goal here is to maintain the CURRENT recreation experience and since users are already stating that they are seeking a more primitive experience in Zone 1, it should naturally have the strictest limitations on motorized travel. Page 26 – I would amend The Travel Management section of Alternative 2 to restrict the use of motorized boats on the Tangle River between the Delta Wayside and the Tangle Lakes Campground. It is true that "motorized boating is naturally restricted by shallow river conditions" but it is naïve to rely on that as the only limiting factor. With the increasing technological development of watercraft that can go more and more places, it would be prudent to specifically restrict the use of motorized craft on this stretch of river. The river is routinely used by fishermen and is in close proximity to the Delta Wayside and the Tangle Lakes Campground. Allowing motorized craft on the Tangle River would pose a threat to public safety and a conflict of users from the noise of motorized craft so near a campground facility.	
22	Limit jet boat activity (motor hps, no jet skis or hover craft). Natural sounds are very important for the outdoor floaters.	Please see response to comment # 03 in this section. The effects to natural quiet and natural sounds are discussed in the EA on pages 99-100.
23	It appears that Alternative 2 creates special controlled use areas within the Tangle Lakes drainage. These special controlled use areas have two specific types of users: general and subsistence. More privileges are granted to the subsistence users in their mode of travel, noise generation (i.e. motors) etc. over there general-use counterparts. This can create disharmony. Allowing motorized boat activity for all, but limiting horse power to 9.9 hp or less, could be a workable alternative. Should subsistence privileges be removed at a point in the future, some traditional travel modes would immediately end. Please ensure those travel modes continue in the future. Don't lose sight of the fact that motorized boat travel on the Tangle Lakes drainage adds a dimension of safety and reliability to water travel. Utilizing a boat motor, though generating some noise, can be good insurance on getting back safely and on time. The Tangles are for the most part above timberline and very exposed. The wind can come up without warning and remain unmercifully strong for extended periods (days). There are few places to hide from the wind and exposure, and hypothermia are a lake traveler's nemesis. Windy weather can be uncommon some years and ever	Please see response to comment # 03 in this section.

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	present on others. To insure consistent and safe lake travel, allow motorized boat usage. If motorized restrictions must be placed, limit horse power and restrict travel only in waterfowl massing areas.	
25	Any relaxation of current restrictions would be unacceptable. The "value" of the area would even be enhanced by tighter restrictions. Noise is certainly a "pollutant" in a wilderness area and should be strictly regulated. As such, high decibel craft such as jetskis, airboats, hovercraft, helicopters and aircraft must be highly restricted. In my opinion, they should be prohibited entirely. Outboard motors should be restricted to 20 hp and lower...	Please see response to comment # 03 in this section. The effects to natural quiet and natural sounds are discussed in the EA on pages 99-100.
27	Monitor the use of powerboats and if possible restrict their use to less than 15 horsepower to reduce noise and wake.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
29	The Delta River is naturally a challenging river to navigate and depending on water levels this task can be further enhanced. This, in conjunction with the limited number of boaters on the river does not warrant a ban implemented on the use of motorized boats past Garret Creek. Again I remind you how we all have stories in which we have rescued others from the floater mishaps on the river.	Alternatives 1 and 3 do not propose any motorized boating restrictions.
30	Ban the use of jetskis, hovercraft, and airboats. These simply have no place in this setting and will also likely damage riparian habitats. There are plenty of other places where people can go and play. Same with ORV's, except for subsistence activities. Limit powerboats and aircraft to Round Tangle Lake only, and place a limit of 15 horsepower for boat motors.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
31	I strongly suggest Jet Skis and airboats be banned.	Alternative 4 proposes limitations on horsepower, airboats, hovercraft and personal watercraft.
32	There are plenty of areas in Alaska where motorized water travel is allowed. Please allow motorize watercraft to powerboat use...to be limited to Round Tangle Lake. On Round Tangle Lake, boat motors should be limited to 15 horsepower. Jetskis, hovercraft, and airboats should not be allowed in any zone of the Delta Wild & Scenic River system.	Please see response to comment # 03 in this section.
34	Prohibit jetskis, hovercraft, and airboats throughout the system. Allow other motor craft to be used only in two places: Round Tangle Lake (at not more than 15 horsepower) and the recreational portion of the Delta River in Zone 5 (by permit for subsistence and mining use, not recreation).	Please see response to comment # 03 in this section.
35	First, in Zone 1, I support no restrictions on motorized boating...This area includes upper Tangle Lake or "Landlocked Tangle" and is accessible by a short portage. To restrict this lake to small motors in June and July restricts my ability to reach one of my favorite areas. Most motors are small because they need to be carried so it is sort of self restricting. In fact the only motor I have ever seen on this lake bigger than a 5 hp was a 14hp in 1985, June....the rest of the motors seen there are usually 2-5 hp and cause little noise and since you have to carry gas few people do. Second, in Zone 2, I support the No Action alternative. Third, in Zone 4, Lower Tangle Lake, I protest its closure to motors. With rare exception, the only motors used here are small 2-5 hp motors which must be lined back up Tangle River upon leaving or are used to push rafts across Lower Tangle to the beginning of the Delta River. Jet boats are infrequently seen and will usually never come back. The Lower Lake is self controlling by its very proximity.	Alternatives 1 and 3 do not propose any motorized boating restrictions.
36	I urge you to NOT allow jetskis, hovercraft or airboats within the corridor...and, if any power boats are to be allowed access, a size limit of 10-15 hp would be in order.	Please see response to comment # 03 in this section.

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40	I think that motorboat use (small motors, no wake zone) is allowable only in Round Tangle Lake, and during hunting season in Upper Tangle Lake. Other motorized craft and vehicles (e.g. jet skies, airboats, hovercraft) have no place within the Wild and Scenic River corridor and should be expressly prohibited.	Please see response to comment # 03 in this section.
41	Prohibiting river boat use of the river above Garrett Creek has no grounds. Canoeists and rafters should not be given priority over motor boats. They are by no means more pure.	Alternatives 1 and 3 do not propose any motorized boating restrictions.
46	I agree with most of what is in Alternative Two with some major exceptions. One major exception is that there needs to be motor boat...restriction in Recreational Management Zone (RMZ) Five. To insure that wilderness values are protected you must restrict motorized boats...(with an exception of authorized subsistence and traditional users) during the months of June and July in RMZs 1, 4 and especially Zone 5 (designed as "wild") which is NOT included in the boat...restrictions in your preferred alternative. These rules are essential to maintain the beautiful tranquility and solitude of this river. I implore you to set limits on horsepower motors in RMZs 1, 2, 4 and 5. Large horsepower motors causes waves that can swamp any unlucky canoe. This has happened to me many times. Having you and your supplies wet is not at all good for the outcome of the trip and could even be life threatening. Large horsepower watercraft is the main contributor to river bank erosion and it deteriorates fish and wildlife habitat. The noise from these motors is very disturbing for nesting waterfowl and can cause abandonment of nests. I'd like to see a 65 horsepower restriction in RMZ Five. There should also be a 35 horsepower limit in RMZs One, Two and Four. I also would like to see a complete ban on air boats and hovercraft. These kinds of watercraft should not be allowed on a Wild and Scenic River. They are greatly detrimental to all species of wildlife and to anyone who is trying to relax/sleep in their campsite. This is something that can completely ruin a wilderness experience and I urge you to address this issue.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
48	The BLM plan should ban jetskis, hovercrafts and airboats from the lakes and river, and should limit...the size of boat motors (< 15 horsepower).	Please see response to comment # 03 in this section.
49	I find specifically, the failure to restrict the use of personal watercraft (jetskis and wave runners), hovercraft, amphibious aircraft, or powerboats of any size from any part of the lakes and river, save the tiny portion in which they are impossible to use by virtue of the falls and the shallowness of some portions of the river, to be particularly negligent. I suggest the plan only allow powered craft with a power of no more than 15-20 h.p. on any of the lakes, that personal watercraft, hovercraft, and airboats be disallowed altogether and...be allowed only on the Round Tangle Lake. If powerboats are allowed in Zone 5 without power restrictions, they should not be allowed to transport OHVs into any other zone, or across the river into sensitive wilderness habitat.	Please see response to comment # 03 in this section.
50	Jetskis, hovercraft and airboats are all high impact machines and should be banned, plain and simple. Round Tangle Lake should be the host for powerboats... Powerboats should be limited to 15 mph. They should be prohibited from the Tangle River between the wayside and the campground.	Please see response to comment # 03 in this section.
51	The current preferred alternative would be an extremely bad change in the management of the area. The existing management of the Tangle Lakes with the limited use of 15hp motors on Round Tangle Lake and no motorized use in other areas is an excellent compromise, allowing fisherman and motor-boaters the opportunity to use and access the area without substantial disruption to the other users. Changes that would allow jet-skis, jet-boats, ski-boats, speed-boats, and even hovercraft anywhere on the lakes or rivers would cause an incredible disturbance to the area. Non-motorized users would quickly remove themselves from the noise, stench, and danger that the presence of such machines causes. Additionally the Tangle Lakes is an important nesting area for birds, and these impacts would unquestionably negatively impact their nesting success. I am a wildlife biologist who has worked in the area and understand how the delicate shoreline habitats could be destroyed by boat wakes and waves. Please do	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).

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	not make any changes to the management plan that would allow for increased use of motorized watercraft in the lakes or Delta River system. Continue the limitation of motorized watercraft to boats under 15hp on Round Tangle Lake and leave the rest of the lake and river system as non-motorized.	
57	...in areas where motorized boats are allowed, boat motors should be limited to 15 horsepower.	Please see response to comment # 03 in this section.
60	I strongly encourage limiting motorized access to what is currently allowed. Specifically, powerboats may have access only to Round Tangle Lake, and limited to 15 horsepower. Hovercraft and airboats produce noise pollution that reaches a mile or more from their location. Jetskis and waverunners create noise pollution, and air pollution that hangs around to affect those with asthma. None of these polluting craft are consistent with maintaining the current relatively unspoiled region. Please do not liberalize the permitted uses of Tangle Lakes and the Delta River.	Please see response to comment # 03 in this section. The effects of motorized boating use are discussed in Chapter 4 of the EA on pages 96-98 (fisheries), pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), pages 113-115 (water quality), and pages 117-119 (wildlife).
65	Please do not allow jetskis, hovercraft, and airboats in any zone of the Delta Wild& Scenic River system, and limit powerboat usage...to Round Tangle Lake.	Please see response to comment # 03 in this section.
67	Jetskis, hovercraft and airboats should be totally banned in the entire river corridor. This is one of the most accessible, non-motorized river corridors in Alaska's interior. Priority for non-motorized use of this entire corridor should be the number one consideration for recreation use on this river. Power boat use...should be limited only to Round Tangle Lake. Boat motors on this lake should be limited to a maximum of 15 horsepower.	Please see response to comment # 03 in this section.
AIRCRAFT		
01	...aircraft landings should be limited to Round Tangle Lake.	Please see response to comment # 03 in this section.
03	Aircraft landings and takeoffs are very noisy. They should be banned throughout the corridor unless it can be demonstrated that airplanes are used for transportation to the area (as opposed to within the area); if that's the case, Round Tangle only could be made available for landings, and only at approximately current levels of use. BLM has proposed almost nothing to manage aircraft flights over the corridor. Overflights, especially commercial ones for purposes like flightseeing or resource extraction, can create serious adverse impacts for both passive and active recreationists on the lands or waters below, and for some wildlife. BLM should do everything possible to prevent this situation from developing and adversely affecting the experience along the Wild and Scenic River. For overflights with no landings on federal lands, and therefore presumably no permit requirement, BLM should seek assistance from the FAA, and if that fails, should seek voluntary compliance with guidelines designating a zone of airspace above and adjacent to the river corridor within which flying should not occur except for reasons of safety when weather conditions are adverse. Where a permit is required for landing, a condition of that permit should be that flying is prohibited within the designated zone except for safety reasons.	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU) and as a component of the Wild and Scenic Rivers System. ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for special access. ANILCA Section 1110(a) provides that the Secretary shall permit the use of snowmachines, motorboats, airplanes and non-motorized surface transportation on CSUs in Alaska, subject to reasonable regulation. Unless these uses are found to be detrimental to the resource values of the area, the applicable methods of access shall not be restricted. Alternatives 2, 3 and 4 were developed with two Recreation Management Zones (RMZ 1 and 4) that would be managed for a nonmotorized setting prescription and nonmotorized recreational opportunities, with targeted setting character conditions that are primitive (RMZ 4) and semiprimitive nonmotorized (RMZ 1). In RMZs 2 and 5, motorized uses are common and these areas have been targeted for a semiprimitive motorized experience. ANILCA access provisions limit the closure of CSUs to the use of airplanes that have been historically used for traditional activities, unless these uses are found to be detrimental to the resource values of the area. The BLM would be required to first determine that airplane landings would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA

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		Section 111O(a). Such a finding requires the agency to follow ANILCA closure procedures outlined in 43CFR36.11. After additional consideration, at this point in time, the BLM believes that the current level of airplane landings in RMZs 1 and 4 do not warrant an ANILCA closure. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if airplane landings are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of airplane landings and impacts before implementing an ANILCA closure, if monitoring shows this is necessary in the future. Alternative 4 will still be analyzed to display the effects of prohibiting airplane landings throughout the entire river corridor, even though this limitation would still be subject to the ANILCA closure procedures and resource degradation requirements specified above. Alternatives 1 and 3 do not propose any airplane landing restrictions. The effects of airplane landings are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), and pages 117-119 (wildlife). Also, please see response to comment # 21 in this section.
06	Aircraft...would be acceptable, if they were restricted to the main Round Tangle Lake, or used for subsistence only.	Please see response to comment # 03 in this section.
07	I urge you to limit....aircraft landings to Round Tangle Lake...	Please see response to comment # 03 in this section.
09	...we think it is important that BLM limit...aircraft landings to Round Tangle Lake...	Please see response to comment # 03 in this section.
10	Aircraft landings and takeoffs are very noisy. They should be allowed on Round Tangle only, for the benefit of people who use planes for transportation to the area. Once in the area, other means of transportation can be employed. As we suggested for Round Tangle powerboat use, aircraft landing levels should also not be allowed to increase significantly. Additionally, as we note elsewhere, just because there is already some artificial noise in an area doesn't mean that additional noises are irrelevant; noise impacts are clearly incremental and cumulative, as are most impacts. The fact that there is some, relatively unobtrusive road noise in Zones 2 and 5 due to the relative proximity of the Denali and Richardson highways doesn't mean it's OK to allow airplane landings (p.93). Overflights of the corridor, especially by commercial aircraft, should be minimized. For activities not requiring a permit BLM should seek voluntary compliance with a no-fly zone above the corridor and a buffer area adjacent to it. For permitted activities, it should be a requirement of the permit that overflights in the no-fly zone are prohibited. An exception would be made for times when safety requires using the zone. BLM does not appear to have taken any action on this issue except with regard to mining (p. 74).	Please see response to comment s # 03 and #21 in this section. The effects of airplane landings are discussed in the EA pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), and pages 117-119 (wildlife). Also, please see response to comment # 21 in this section.
13	...please limit...aircraft to Round Tangle Lake.	Please see response to comment # 03 in this section.
21	On page 74 it states that the "BLM has worked with mining companies to limit . . ." Has this approach worked? Is there a requirement for a mining company to work with BLM to minimize their impacts to the river corridor if they are flying over it or is this a good faith effort? I am concerned about the aviation impacts that would come with a large scale mine located on state land. I would hope that the BLM would outline actions to minimize impacts from such concentrated air action across the Delta corridor, keeping in mind that the sound of aircraft, particularly helicopters, has a much larger and far reaching impact on non-	The BLM does not have the authority to regulate airspace within the river corridor, unless it is associated with a Special Recreation Permit (SRP) or a land use authorization for commercial filming. Stipulations associated with the issuance of SRPs or land use authorizations provide the BLM with considerable flexibility to minimize disturbances to river users on

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	motorized users than the sight of the aircraft. I applaud the aviation limitations outlined for June and July but am more concerned about aviation actions association with the mining aspects of the area.	the ground. These stipulations would depend upon a variety of factors including frequency of flights, flight ceiling levels, duration of flights, etc. The BLM does monitor low level overflights within the river corridor, and has contacted both the US Air Force and mining companies on adjacent state lands to request that any overflights avoid the river corridor, if possible. In 1997, the Federal Aviation Administration and US Air Force modified the boundaries of the Fox Military Operations Area (MOA) to exclude the DWSR corridor. The new boundaries of the FOX MOA were situated on the western boundary of the Delta River. The BLM will continue to work with the FAA, United States Air Force, and mining companies to discuss the potential effects to recreational users by low level overflights adjacent to the river corridor. The effects of airplane landings are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), and pages 117-119 (wildlife).
25	...high decibel craft such as...helicopters and aircraft must be highly restricted. In my opinion, they should be prohibited entirely.	Please see response to comment # 21 in this section. The effects of airplane landings are discussed in the EA on pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), and pages 117-119 (wildlife).
30	Limit...aircraft to Round Tangle Lake only...	Please see response to comment # 03 in this section.
32	Please allow...aircraft landings to be limited to Round Tangle Lake.	Please see response to comment # 03 in this section.
34	Prohibit aircraft landings, except on Round Tangle Lake.	Please see response to comment # 03 in this section.
35	First, in Zone 1, I support no restrictions on...airplane landings.	Alternatives 1 and 3 do not propose any restrictions to airplane landings in RMZ 1.
40	I see two issues; one is private planes landing on the Tangle Lakes. I believe that continued private (not commercial) float plane landings could be allowable in Round Tangle Lake and on Upper Tangle Lake during hunting season, but not on the other lakes in the Tangle Lake complex or on the river or in the river corridor. The second issue is aircraft over flights. Some aircraft may require a permit from BLM (e.g. mineral operations); others may not (flight seeing or hunting). Both should be limited by either permitted or voluntary ceiling limits or no fly areas. Few things are more intrusive than low flying aircraft while enjoying a float on a Wild River. While aircraft have a legitimate place, flying low over a Wild River is not acceptable.	Please see response to comment # 03 in this section. Stipulations associated with the issuance of special recreation permits or land use authorizations provide the BLM with considerable flexibility to minimize disturbances to river users on the ground, and these stipulations would depend upon a variety of factors including frequency of flights, flight ceiling levels, duration of flights, etc. The effects of airplane landings are discussed in the EA pages 99-100 (natural quiet and natural sounds), pages 109-111 (travel management), and pages 117-119 (wildlife). Also, please see response to comment # 21 in this section.
44	Flight-Seeing is the most non-impact method of enjoying our natural resource world. Flight-Seeing may be the only way some older or infirm people can enjoy the Delta River Corridor. This activity provides the viewer with a totally different perspective of the vast natural beauty of the resource. Granted, there is some noise factor that will be objectionable to some users on the ground (river). Let it be known however that the Delta River resource belongs to all and not just the physically fit. Flight-Seers also object to the obnoxious colors (non-natural fluorescent greens, reds and yellows for example) flaunted by the many campers within the river corridor. This should also be a consideration of the Delta River Plan.	The BLM has the authority to issue commercial recreation permits or land use authorizations for commercial flightseeing or filming. None of the alternatives propose limitations on flightseeing within the river corridor.
46	I agree with most of what is in Alternative Two with some major exceptions. One major exception is that	Please see response to comment # 03 in this section.

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	there needs to be...airplane restriction in Recreational Management Zone (RMZ) Five. To insure that wilderness values are protected you must restrict...plane landings (with an exception of authorized subsistence and traditional users) during the months of June and July in RMZs 1, 4 and especially Zone 5 (designed as "wild") which is NOT included in the...plane restrictions in your preferred alternative. There should be no new airstrips or other developments constructed in the area. Alternative Four is too restrictive. It is not necessary to ban all...airplanes. There needs to be a balance between allowing recreational activities and protecting wilderness and natural resources.	
48	The BLM...should limit aircraft landings...	Please see response to comment # 03 in this section.
50	Round Tangle Lake should be the host for...aircraft landings.	Please see response to comment # 03 in this section.
65	...limit...aircraft landings to Round Tangle Lake.	Please see response to comment # 03 in this section.
67	...aircraft landing should be limited only to Round Tangle Lake.	Please see response to comment # 03 in this section.
SNOWMACHINES		
03	Snowmachines can be substantial polluters. Their use in the corridor should be strongly discouraged.	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU) and as a component of the Wild and Scenic Rivers System. ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for subsistence uses and special access. ANILCA Section 811 states that the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Similarly, ANILCA Section 1110(a) provides that the Secretary shall permit the use of snowmachines, motorboats, airplanes and non-motorized surface transportation on CSUs in Alaska, subject to reasonable regulation. Additional information regarding snowmachine use can be found in the EA on page 81 in Section 3.2.10.8 Winter Use. The BLM does not believe that the current level and frequency of snowmachine use is causing impacts that require snowmachine limitations at this time. Also, please see response to comment #21 in this section.
10	Many if not most snowmachines are heavy polluters. Water pollution in the corridor could perhaps be minimized by requiring snowmachines to avoid the corridor except to make right angle crossings, preferably on the highway. Additionally, snowmachines can create stress for wintering moose and caribou; monitoring should be undertaken to insure that this is not occurring.	Please see response to comments #03 and #21 in this section.
21	On page 74 under 3.2.10.7 Winter Use, it is stated that the EARMP had some language regarding snowmachine use and potential threat to critical moose wintering habitat. It is the only place within the Draft that I see this mentioned. Is this the avenue for implementing such limitations as outlined in the EARMP? Are there monitoring efforts going on to see if the snowmachine use is in fact impacting the large concentrations of wintering moose in the Delta system, specifically around high use times like Arctic Man? I understand that Arctic Man takes place on State land but the overflow from this high use time does spill	Limitations regarding snowmachine use that were developed in the EARMP would remain in effect unless changed in this Land Use Plan Amendment. Monitoring of trails within and adjacent to the Delta River corridor does occur periodically throughout the winter and during the Arctic Man event. Results of monitoring have shown that there is not a substantial amount of

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	into the Delta Corridor. If there is no monitoring taking place, then how will we know when the limitations need to be implemented? Does the effects section outlined on pages 98-99 4.2.14.1 take into account the impacts of snowmachine use on wintering moose as outlined in the EARMP? On page 78 it clearly states that one of the wildlife management concerns related to recreational activities is that recreationists "may further fragment moose and caribou habitat." This should extend to snowmachine use as well as OHVs since one of the most stressful times for moose and caribou are the winter and spring months. I would like to see some language in the Delta Draft EIS that addresses these issues. At the very least, some specific monitoring actions to be sure that an issue identified previously is followed through on and documented. It is seen as acceptable by the public to shoot wolves in the attempt to boost moose populations (I understand this is a State program and has no BLM connection) so they should also be in favor of reasonable restrictions to their specific recreational (not subsistence) activities to protect that same population. It should at least be outlined as an allowable and considered management tool to be used in the future if documented impacts to wintering moose occur from snowmachine use.	snowmachine use within the river corridor in areas with large concentrations of wintering moose. Moose generally winter lower down in the river valleys and snowmachines tend to use the pipeline corridor as an access route, rather than venturing into the deep snow found in the river valleys. The effects to wintering moose were not analyzed in this EA because they were already analyzed in the EARMP. Decisions made in the EARMP regarding snowmachine use in the DWSR corridor will remain in effect, and winter monitoring will continue as prescribed in the EARMP, with potential limitations to snowmachine use if monitoring shows that wintering moose are being negatively impacted.
PACK ANIMALS		
44	Domestic Herbivores (horses, llamas, etc) have been the source of invasion for non-indigenous plants (weeds). Their use should only be allowed if they have been fed "Certified Weed-Free Forage". This is the only forage that should be allowed into the river corridor also.	The BLM will add the recommendation that "certified weed-free forage and bedding" be used for pack animals and dog mushing in Alternative 2. This will be stated as a recommendation, rather than a regulation, due to the fact that enforcement would be difficult given the multiple access points into the river corridor where pack animals and dog mushing historically occurs.
NONMOTORIZED TRAILS		
03	AQRC advocates not only for the elimination or minimization of motorized recreational use and artificial noises on the public lands (with the many benefits thereby provided), but also for the specific provision of high quality muscle-powered recreation opportunities. Consequently, we generally support the designation of both trails and larger areas, screened if at all possible from the impacts of motorized use, for non-motorized use only. We therefore heartily support BLM's proposals for the designation/creation of non-motorized trails in the corridor—with one exception. After talking with local residents who use the area, we suggest not designating the Rock Creek Trail in order to maintain a sustainable berry resource for those residents.	Under Alternative 4, only the Lower Tangles Ridge Trail would be designated as a nonmotorized trail. Alternative 2 would designate four nonmotorized trails, including the Rock Creek Trail. The BLM believes that the designation of these four trails would not significantly affect the density of berry resources that are located adjacent to the Denali Highway throughout the entire watershed and highway corridor.
10	We are very pleased to see that BLM is proposing designating and/or creating several non-motorized hiking trails. We have consistently emphasized the need for more opportunities for high quality non-motorized recreation on the public lands, including the federal and state public domain (the majority of the lands BLM manages are public domain). Agencies often talk about the need to "maintain" a diversity of recreational experiences (see, e.g., p. 6). But frequently, especially—but not only—on the public domain, the need actually is to "create" high quality opportunities that don't presently exist. We would note that although trail designations are definitely important, designating larger areas, topographically screened from motorized use, is equally important. There are many opportunities for non-motorized users to recreate on lands also used by motorized users, but in most instances this ends up being anything but a high quality experience; non-motorized users have been largely displaced from the vast majority of the public domain, which is effectively managed for motorized use, often very intense use. Consequently, it feels odd to raise a concern about one of the agency's hiking trail proposals when we would ordinarily applaud such an effort. We do think, however, that it would be unwise to designate the Rock Creek Trail. This trail runs through a popular berry-picking area for local residents. The berries are adequate at this time even for the relatively high number of pickers, but the resource could quickly be depleted by hikers if the trail were to be designated. Since BLM has three other proposals for designated	Please see response to comment #3 in this section. Alternative 4 only proposed the designation of one nonmotorized trail to provide for a more primitive, low density experience with less trail development and scenic impacts.

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	hiking trails in a fairly small area (the campground trail, already largely developed, was a great idea), we think non-motorized hiking opportunities in the area would still be adequate without this one designation. One flaw in the campground trail is its high visibility. Perhaps it was constructed according to the usual BLM standards, but a standard for a wooded trail works poorly for a trail through low vegetation. For instance, a trail of that sort on the east side of the Upper Tangles (the one that would start at mile 21) would be a visual blight for people canoeing on the lake, walking on the esker to the west, or driving the highway. Signs on the trail should be few, low to the ground, and non-reflective. We would be pleased to discuss this further before you begin trail construction. Finally, just as an aside, although we understand BLM's rationale for proposing fewer hiking/non-motorized trails in Alternative 4 than in the Preferred Alternative (see p. 90), in our experience there are likely to be more such trails proposed in an agency's conservation alternative than in other alternatives, since non-motorized use is so much less intensive, obtrusive, and destructive than motorized use, and should be strongly encouraged.	
21	I support the development of hiking trails in Zone 3 as outlined on pages 69-70. This area is road accessible and offers the Denali Highway traveler the unique opportunity to get out of the car, hike a short trail with amazing views and cultural history with minimal effort. The geography of the area lends itself to hiking on the tops of the esker ridges along game trails. Visitors already get out and hike the areas in and around Zone 3. The creation of sustainable, engineered hiking trails will reduce the unsightly vertical trails up the sides of ridges and reduce soil and vegetation impacts while enhancing the scenic experience of the area.	The BLM agrees that the designation and maintenance of these nonmotorized trails will help to reduce trail erosion, rutting, and alteration of existing scenic qualities in the area while helping to protect soil and vegetation resources.
40	There is an abundance of trails in the Tangle Lakes area. In recent visits I've been pleased to note that new well-designed trails are being constructed; I completely support this. Many of the trails have developed over the years without planning or thought given to their sustainability or their effect on the vegetative cover or soils. These need to be improved so they are not a detriment to the local environment or closed and allowed to grow over (a long process). An inventory of trails, a trails plan, and monies for trail building and maintenance should be part of the river management plan.	The BLM agrees that the designation and maintenance of nonmotorized trails in the Tangle Lakes area will help to reduce trail erosion, rutting, and alteration of existing scenic qualities in the area while helping to protect soils and vegetative cover. Trail designation will help to ensure that these trails are maintained in a sustainable manner for future generations.
BENEFITS BASED RECREATION MANAGEMENT		
05	Since the new planning approach focuses on "identifying the primary activities, experiences, and benefits" I would like to share mine. The Delta Wild and Scenic River is my favorite place in interior Alaska for a long weekend getaway. I enjoy canoeing, rafting, wildlife viewing, hiking, and generally soaking up the scenery and solitude in the area. My experience is enhanced by the pristine, quiet nature of the area. I benefit greatly by just knowing the area is there and protected.	The primary activities, experiences and benefits that you describe are reflected in the Recreation Management Zones that have been identified in Alternatives 2, 3 and 4.
10	Primitive, semiprimitive non-motorized ROS classifications. We're a bit baffled. There's nothing primitive, non-motorized, or, put differently, "wild" (used generically) about motorized vehicles, as land managers in the far less primitive lower 48 seem to recognize. Why, except for June and July, are powerboats, and in the winter, snowmachines, proposed to be permitted in areas with these two classifications?	The Alaska National Interest Lands and Conservation Act (ANILCA) established the Delta River as a Conservation System Unit (CSU) and as a component of the Wild and Scenic Rivers System. ANILCA provides specific guidance for management issues that are unique to Alaska, including considerations for subsistence uses and special access. ANILCA Section 811 states that the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Similarly, ANILCA Section 1110(a) provides that the Secretary shall permit the use of snowmachines, motorboats, airplanes and non-motorized surface

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		transportation on CSUs in Alaska, subject to reasonable regulations. Unless these uses are found to be detrimental to the resource values of the area, the applicable methods of access shall not be restricted. The BLM intends to manage and target RMZs 1 and 4 for nonmotorized recreation, but unlike the Lower 48, ANILCA access considerations ultimately prevail. Unless monitoring shows that motorized uses are detrimental to the resource values of the area, upon which time an ANILCA closure procedure would be considered, these areas will continue to be managed for primitive and semi-primitive nonmotorized experiences. In the meantime, geography (low water, portages) and lack of suitable landing areas help to contribute to historically low levels of motorized boating and airplane landings in RMZs 1 and 4.
23	Having used Tangle Lakes for over 25 years, I think you should consider placing Upper Tangle Lake in Zone 2 rather than in Zone 1 if Management Alternative 2 is selected. This lake is nearly three miles long and runs north and south. The winds in this area can change quickly from calm to intense. These winds funnel down the lake from either the north or the south. Allowing motorized boats would allow people to disperse along this lake for hunting, berry picking, etc. Motorized boats allow younger or older people to reliably and safely utilize this unique area. I have canoed on this lake with my children when they were 10-14 years old, and though they paddled to the far end of the lake in relatively calm conditions, they could not have done so if the wind had picked up. I've experienced my children wanting to camp on the south end of Upper Tangle Lake, but had to refuse, because if the wind came up overnight, they would have not been strong enough to paddle to the north end. I've known other parties who have paddled to the south end of the lake, had the wind come up and have had terrible ordeals. Motorized boat traffic solves that problem. Limiting horsepower to 9.9 or less would be acceptable. This lake is not a major nesting area for waterfowl. This lake is landlocked and has a different type of habitat than other lakes within this system. Motorized boat traffic was common on this lake. Two boats have been left on the north end of this lake, near the portage, for many, many years, though they both appear to have been removed recently. I realize that subsistence users will be able to use motorized boats on this lake, however, hunters and fishermen from outside of Unit 13 commonly use this area, and they would be cut off from motorized use and the ability to reliably bring camps to the south end of this lake. Responsible motorized boating adds a safety and reliability factor to this lake and allows people to walk and portage to other lakes for wildlife viewing, etc., at a time when we need to encourage outdoor physical activity. Allowing people to pack items across the portage and continue motorized boating on Upper Tangle Lake is a physically positive idea. Without the above provision, Management Alternative 2 could result in people stacking up on the south end of the present Zone 2, causing heavy use in the portage area. The portage itself has changed little in the past 25 years, even though motorized traffic has not been restricted on the lakes.	Alternative 3 would allow for unrestricted motorized boating use in all Recreation Management Zones (RMZ). The boundaries between RMZs were developed to provide a diversity of recreational opportunities, including primitive and semiprimitive nonmotorized experiences, based on the prevailing uses and the potential of these areas to offer these prescribed setting characteristics. The mere fact that motors can be used in this area does not necessarily mean that the prescribed setting character should include motorized use.
27	Include berry picking in your list of recreational opportunities. It may be viewed as "subsistence" but it is chiefly recreational.	The BLM does not believe that berry picking is a primary recreational use in any of the Recreation Management Zones. We agree that it does occur in areas that are adjacent to the Denali Highway, but do not believe it is a primary recreational activity that drives the management intent of the recreation management zones (i.e. does not require intense recreational management).

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41	My area of greatest concern is zones 4 and 5. In general, your preferred Alternative #2 is too restrictive. You have arbitrarily drawn a line between these two management zones at Garrett Creek. Why at this point? River boat access above this point is, in most all years barring low water, very accessible. Never has there been a year when we've hunt when we could not get above Garrett Creek. Most years we have been able to boat to the lake below the rapids and above the braided portion of the river. One year, to rescue two stranded canoeists, we managed to get to within 1/4 mile of the mouth of Wildhorse Creek. Your dividing line at Garrett Creek to prohibit motorized boats above this point is arbitrary and unsupportable. Why can you propose to allow boats above Garrett Creek for subsistence users? Does this not contradict your assertion that it is not and should not be navigable above Garrett? Alternative #3 fairly addresses this issue by allowing motorized boats above Garrett Creek.	Thank you for your support of Alternative 3. In regards to Alternative 2, navigability is not dependant on whether or not a motorized watercraft can be operated on a particular river. The Federal test for navigability relies on whether or not a river was used for travel, trade, and commerce at the time of statehood. The BLM navigability determination determined that it was not used for travel, trade, and commerce at the time of statehood above Garrett Creek, therefore nonnavigable in this portion of the river corridor. This determination was completed independently from this planning process. The boundaries between RMZs were developed to provide a diversity of recreational opportunities, including primitive and semiprimitive nonmotorized experiences, based on the prevailing uses and the potential of these areas to offer these prescribed setting characteristics. The mere fact that motors can be used in this area does not necessarily mean that the prescribed setting character should target motorized use. Given this information, the boundary between RMZs 4 and 5 was developed to provide a primitive, nonmotorized opportunity in RMZ 4. Documented motorboat use above Garrett Creek in RMZ 4 is very low; consequently this allows the BLM to manage for a primitive nonmotorized experience in this area.
GENERAL RECREATION MANAGEMENT		
03	...generator use is very irritating, and should be banned in the campground from 5 pm to 9 am so that people can enjoy some peace and quiet after a busy, active day as well as get a decent, undisturbed sleep.	Supplemental rules for the Tangle Lakes Campground will specify regulations regarding the use of generators in the campground. Also, please see comment #29 in this section.
10	We applaud BLM for including natural quiet and natural sounds as resources that need to be addressed in all three of the document's key chapters: Proposed Action and Alternatives, Affected Environment, and Environmental Impacts (see, e.g., pp. 8, 11, 17). This is very encouraging. And, undeniably, BLM has taken a number of steps to help protect these essential resources. Unfortunately, more can, and should, be done, as we discuss below, primarily with regard to motorized recreation. We would add that the loss of natural quiet and natural sounds is more than just a social issue. Artificial noises can adversely affect not just humans but wildlife as well; the latter effects are increasingly being documented in the scientific literature.	Thank you for your comment.
15	This region is a cold climate region with a very short user time period. I don't believe it is the best interest of all users to limit the time period they can use the land.	Under all alternatives, camping will be limited to 14 consecutive days within any 60 day period. This provides opportunities for other users to enjoy recreational facilities and opportunities that are available to all.
29	Under the administrative sections it indicates that "special rules for the river corridor will be developed…" . Does this mean additional rules that are not included in this draft will be added, without public comment?	Under Code of Federal Regulations 8365.1-6, Supplemental Rules for the Tangle Lakes Campground will be developed after the campground renovation, and will specify regulations regarding allowable uses within the developed facilities. These rules for the developed facilities must be developed in accordance with CFR 8365-6, which requires posting of the rules, publishing in the Federal Register and local newspapers, and the opportunity for public comment.

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55	Under the proposed action alternative (pg. 19) the EA states: "Special rules for the river corridor will be developed in accordance with 43 CFR 8351.2-1 to address restrictions on travel management, group size, occupancy and use, chainsaw use and firewood gathering, recreational shooting, fireworks, supply caching, and disposal of human waste." This section of the general BLM regulations authorizes the authorized officer to issue written orders which close or restrict the use of lands and water surface administered by the BLM within the river corridor of the Delta Wild and Scenic River. However, the regulations in this section are not the proper authority for regulating travel management within the river corridor. As you are aware, within Alaskan conservation system units, including wild and scenic rivers, ANILCA Section 1110(a) permits, "(t)he use of snowmachines (during periods of adequate snow cover, or frozen river conditions in the case of wild and scenic rivers), motorboats, airplanes and nonmotorized surface transportation methods for traditional activities and for travel to and from villages and homesites. Such use shall be subject to reasonable regulations by the Secretary to protect the natural and other values of the conservation system units, national recreation areas, and national conservation areas, 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 would be detrimental to the resource values of the unit or area." The regulations at 43 CFR Part 36.11 implement Section 1110(a) regarding the use of snowmachines, motorboats, nonmotorized surface transportation, aircraft, as well as off-road vehicle use. These regulations also provide closure procedures for restricting their use. Specifically, 36.11(h) outlines the closure procedures that must be followed: Closure procedures. (1) The appropriate Federal agency may close an area on a temporary or permanent basis to use of aircraft, snowmachines, motorboats or nonmotorized surface transportation only upon a finding by the agency that such use would be detrimental to the resource values of the area. (2) Temporary closures. (i) Temporary closures shall not be effective prior to notice and hearing in the vicinity of the area(s) directly affected by such closures and other locations as appropriate. (ii) A temporary closure shall not exceed 12 months. (3) Permanent closures shall be published by rulemaking in the FEDERAL REGISTER with a minimum public comment period of 60 days and shall not be effective until after a public hearing(s) is held in the affected vicinity and other locations as deemed appropriate by the appropriate Federal agency. (4) Temporary and permanent closures shall be: (i) Published at least once in a newspaper of general circulation in Alaska and in a local newspaper, if available; posted at community post offices within the vicinity affected; made available for broadcast on local radio stations in a manner reasonably calculated to inform residents in the affected vicinity; and designated on a map which shall be available for public inspection at the office of the appropriate Federal agency and other places convenient to the public; or (ii) Designated by posting the area with appropriate signs; or (iii) Both. Any restriction or closure of lands or waters within the Delta Wild and Scenic River corridor to the use of snowmachine, motorboat, aircraft or nonmotorized surface transportation must follow these procedures. Such closures cannot be legally implemented through adoption of a final plan or plan amendment. Neither the statute nor the regulations allow an agency the discretion to implement closures or restrictions to authorized uses prior to notice and hearing. Section 36.11(g) Off-road Vehicles, in accordance with Executive Order 11644, regulates use and permitting of off-road vehicles within conservation system units. One point that must be clarified in the final EA and plan amendment is that the "traditional activity" standard does not apply to access via motorboats, airplane and nonmotorized surface transportation. The regulations in Sections 36.11(d, e & f) do not restrict use of motorboats, airplanes and nonmotorized surface transportation only for traditional activities or travel to and from villages and homesites. The Department of the Interior addressed this in the supplementary information accompanying the Title XI regulations when they were published in the Federal Register in 1986: "Some commenters criticized the proposed regulations on motorboats and aircraft used within areas, in that those uses are not restricted to traditional activities and travel to and from homesites as in the statutory authorization. These commenters preferred the more restrictive language of the statute. Interior is of the view that it has the discretion to broaden the authorization beyond that required in the statute in light of other authorizations. Executive Order 11644 (EO 11644), on off-road vehicles (ORV) does not apply to motorboats or aircraft, so Interior is not limited by its requirements in authorizing these	BBM was used to develop recreation management zones (RMZ) that offer different primary recreational opportunities. The RMZs were developed to provide a range of recreational opportunities, including primitive and semiprimitive nonmotorized experiences, based on the prevailing uses and the potential of these areas to offer these prescribed setting characteristics. After additional consideration, the BLM agrees that a traditional use determination would be needed to implement a seasonal closure, and at this point in time, the current level of motorized boating use and airplane landings do not warrant an ANILCA closure. The BLM also agrees that the BLM would be required to first determine that motorized boating and airplane landings would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA Sections 111O(a) and 811(b), and that any restrictions under ANILCA Section 1110(a) would have to be in accordance with the process established in 43 CFR 36.11. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if these uses are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of use and impacts before implementing an ANILCA closure, if monitoring shows this is necessary in the future.

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	uses. After review of the impacts of these uses on the areas, including a review of the experience of the NPS and the FWS with their current regulations which are identical in addressing motorboat and aircraft uses, it was decided that deleting the limiting language of the statutory authorization would not significantly increase the use of areas by motorboats and airplanes. Such use would not be in the derogation of the values and purposes for which these areas were established, and would provide for greater enjoyment of these areas by visitors. Accordingly, to allow for access to the areas, the restrictions on motorboat and fixed wing aircraft use have not been increased in the final regulations." (51 FR 31626) The final EA and plan amendment should be revised to reflect that use of motorboats, aircraft and nonmotorized surface transportation are not restricted to "traditional activities" or for access to villages or homesites. Additionally, we must question whether or not the ANILCA 1110(a) standard of "detrimental to the resource values of the area" has been met for restricting motorboat or airplane use in any of the management zones. While the BBM focus groups addressed the issue of motorized access, there was considerable disparity in the views expressed regarding continued use or desired outcomes. The EA does not present any findings or determinations, as required by statute and regulations that resource values of the Delta WSR are being impacted to the point where even seasonal restrictions to access by motorboat or aircraft are justified. While we acknowledge that we are unfamiliar with the BBM concept, we must question whether or not its use is appropriate, particularly for providing justification for restricting allowed uses within ANILCA conservations system units. Public uses allowed by ANILCA within conservation system units in Alaska include a range of subsistence activities, motorized and non motorized access, sport hunting and fishing, as well as other recreational and traditional activities. These uses often overlap. As we understand it, the BBM was designed to manage recreational uses and not the range of allowed uses within conservation system units such as the Delta Wild and Scenic River. We would suggest that the BBM can complement, but not replace the standards or criteria for managing or restricting uses authorized under ANILCA.	
56	Gold panning is not mentioned as a recreational use in the document. The Delta River and its tributaries drain a vast mineral-rich area. Some visitors enjoy panning in accessible streams and other water courses. We request the document address allowed activities and equipment with regard to recreational gold mining. We further request that any guidelines be consistent with generally allowed uses on state land. For example, hand versus motorized equipment, size of suction dredge, what materials may be processed (bank versus gravel bars).	The BLM has not documented recreational gold panning as a primary recreational use within the DWSR corridor, nor did this issue arise during the scoping process. At this time, we do not believe that it warrants the development of allowable activities and equipment associated with this type of use.
HUMAN WASTE MANAGEMENT		
22	...human waste needs to be better managed. Maybe being more self contained and removed from the river area. "Leave no trace" philosophy.	Alternatives 2, 3 and 4 outline a comprehensive adaptive management strategy for human waste within the river corridor, with a high degree of emphasis on Leave No Trace river ethics.
27	Make sure an alternative is in place and working before removing outhouse at the portage. It has served to keep the area relatively free of human waste for the past 25 years.	Alternatives 2 and 4 propose the removal of the outhouse at the river portage only after a portable toilet cleanout facility has been developed and the use of portable toilet systems is mandatory, at which point the outhouse will be unnecessary.
41	My past experience when canoeing indicated that the outhouse at the portage takeout was heavily used. Not having something at this site could result in many feces pile sites along with potential pollution of the river.	Please see comment # 27 in this section.
62	Human waste management should not include required use of portable toilets by non-commercial users under any scenario.	Alternative 3 does not require the mandatory use of portable toilets by any users. Alternatives 2 and 4 do not require the

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		mandatory use of portable toilets unless other methods described in the previous phases are unsuccessful. This approach allows the public to drive the implementation of more restrictive management actions. It is the hope of the BLM that increased education regarding proper human waste disposal (ie. catholes and voluntary use of portable toilets) will prevent the more restrictive approach of requiring portable toilets.
CAMPSITE MANAGEMENT		
29	Why is there a need to designate specific camp sites along the river? If BLM is implementing other strict regulations then campers should be able to overnight where they feel is appropriate.	Please see response to comment #40 in this section.
40	In thirty-four years of floating the Delta River I have noted increased human impacts in the corridor. These are particularly evident in ATV/ORV trails and mining roads but I wish to address the prime campsites. I expect that the threshold of human use has been crossed and warrants designated campsites that are hardened in some fashion (e.g. tent sites, fire rings, outhouses). I would advise identifying and hardening these sites but not requiring their use at the current recreational use levels. In this fashion campers who want to camp in a more rustic situation can do so if they choose a site that is not so easily used or accessed as the designated hardened sites. First identify the campsites; those that are best in terms of access and capacity make designated improved campsites. Leave the second tier of campsites as they are to be used by campers who prefer a more rustic and natural setting. Continue to promote Leave No Trace best practices along the corridor.	The designation of campsites that are located adjacent to the river helps to protect fragile riparian, vegetative and scenic resources. Newly created campsites tend to attract other river users, and once established are difficult to rehabilitate. Campsite management actions in all alternatives were developed to protect the greatest amount of river resources possible, while still providing options for campsite management that include the development of additional campsites in sustainable locations based on a variety of factors including use levels, vegetative screening, soil stability, etc. Under all alternatives, dispersed camping at least 200 feet from the river corridor will be allowed. The effects of campsite management are discussed in the EA on pages 94-96 (cultural resources), pages 100-105 (recreation resources), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetative resources), and pages 113-115 (water quality).
LITTER MANAGEMENT		
21	Litter. Page 26 – Suggest re-wording. A volunteer campground host cannot be required to “enforce” anything. I understand that they need to be able to make sure people pick up their garbage but the word “enforce” should be reserved for a Ranger action.	Thank you for your comment. The word “enforcement” will be removed in the EA.
62	BLM’s management of this area should be limited to: Periodic cleanup of campsites.	The periodic cleanup of campsites is prescribed in all alternatives.
FIRERING MANAGEMENT		
21	I would like to support the dismantling of all firerings at sites that a river patrol attends to. If the majority of the garbage is found in the firerings, I see no reason to wait for phase standards and indicators to kick in to address the issue. The effects analysis shown on page 87 speaks volumes to the implication of stricter firering /firepan standards right from the beginning. Are there any other rivers in Alaska that require the use of a firepan and users to pack out their ash? I don’t mind coming upon a campsite with a firering. I do mind the garbage and the huge firewood logs that are half burnt lying around. If I had to do away with my firering to get rid of the garbage problem then so be it.	The dismantling of firerings has been proposed as a Phase II management action in Alternatives 2 and 4. The BLM believes that the less restrictive option of education should be used before more restrictive measures are implemented.
62	Fire ring management should not include required use of fire pans by non-commercial users under any scenario.	Alternative 3 does not require the mandatory use of firepans by any users. Alternatives 2 and 4 do not require the mandatory use of firepans unless other methods described in the previous

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		phases are unsuccessful. This approach allows the public to drive the implementation of more restrictive management actions. It is the hope of BLM that increased education regarding proper litter disposal and firering use will prevent the more restrictive approach of requiring firepans.
CHAINSAW USE		
03	We very much support the proposed general prohibition on...chainsaws in the corridor. We think it very inappropriate and unnecessary, however, to allow chainsaw use in the campground. Just because a certain level of noise is inevitable in the campground (or to a lesser degree, elsewhere in the corridor) doesn't mean that additional noise doesn't exacerbate the problem. It's quite simple—less noise is better than more noise. Chainsawing doesn't have to occur in the campground, and it shouldn't be allowed.	Alternative 4 will be changed to prohibit the use of chainsaws within the developed facilities in RMZ 3. In the remaining Alternatives, the use of chainsaws within the developed facilities in RMZ 3 would be limited by the establishment of quiet hours in supplemental rules that will be developed after the campground renovation. The effects to natural quiet and natural sounds are discussed in the EA on pages 99-100.
10	Regarding firewood gathering, we support the proposed rules. Regarding the use of chainsaws, we believe they should not be allowed anywhere in the corridor, including developed Zone 3; such use anywhere, including the campground, is unnecessary and would be extremely disturbing (just because the campground will admittedly be noisier than other areas in the corridor doesn't mean that noise shouldn't be minimized, and that unnecessary noise sources shouldn't be prohibited). Similarly, generators, which can be highly obtrusive, should not be allowed to be operated from 6pm to 8am; this would allow fellow campers to not only sleep in peace but also to enjoy some quiet relaxation time at their campsites.	Please see response to comment #03 in this section.
21	Chainsaws being allowed to be used in a campground (page 27) is a substantial and manageable user conflict. I understand that the use of a chainsaw to cut up firewood would be beneficial to the subsistence hunter who is camping at Tangles during their hunting season. But a loud chainsaw running in a campground where people are sleeping/relaxing, I would consider a nuisance and inconsiderate. Possibly re-word to say that chainsaw use within the campground will not be restricted but is discouraged for reasons of camping consideration. Or make chainsaw use restricted within the campground during June and July when the majority of the recreational use of the area takes place but allow it during subsistence hunting season. I support restrictions on chainsaw use for other Zones.	Please see response to comment #03 in this section.
29	...it is common knowledge that dead wood is best suitable for firewood and therefore, if dead wood is collected for fire building then chainsaws should be allowed for the ease of transporting wood. It is also common knowledge that, one should collect wood further from camp, rather than closer, to save the closer wood for those times when it is in great need. The ability to cut the wood allows for easier transport.	Alternative 3 would allow for chainsaw use throughout the entire river corridor for dead and down and standing dead trees at least 200 feet from the river's edge. Also, please see response to comment # 39 in this section.
37	Within the Wild and Scenic corridor, I would further recommend that chain saws could be used to cut only dead trees leaning over the water of the river. In my experience, chainsaws encourage wasteful cutting (beyond true needs) and landscape manipulation, such as at the "Boy Scout" campsite on river right in the clear water section downstream of the falls.	The BLM does not support the cutting of dead trees leaning over the water due to the visual impacts and loss of riparian habitat. Woody debris along the riverbank is a natural occurrence that helps to stabilize the shoreline, while providing habitat for a variety of aquatic and terrestrial species.
38	I am concerned that a ban on chain saw use in the valley will have a negative effect. Floaters are not going to go and harvest the dead fallen trees but rather the smaller living trees and branches that can be cut up easily with an axe or small hand saw. Then this rivers camp spots will end up looking like the Gulkana's where every tree at each camp site is stripped from the ground to an arms length for the easily accessible wood to burn. Having chain saws allows us to be able to cut up the larger dead falls. The groups that I know that use the river do not cut live trees for firewood. We all make a habit to gather wood	Alternative 3 would allow for chainsaw use throughout the entire river corridor for dead and down and standing dead trees at least 200 feet from the river's edge. In Alternative 2, written authorization may be given for subsistence house log gathering or personal firewood cutting, depending on the proposed location within the river corridor. Also, please see response to comment

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	that's already dead. I personally only take the dead trees that are deeper into the woods. I usually have access to OHV when I'm there and they help in the harvesting. I like to leave the easier accessible dead trees that are closer to the river in hopes that floaters will use these rather than cut live trees down. What are the loop hole for getting a "written authorization with special stipulations from BLM" in order to use a chainsaw with in the Delta River corridor? If I tree is already on the ground, does it really matter what type of tool cuts it up?	#39 in this section.
39	Chainsaw use in the DWSR corridor below the falls: We would like it allowed. Regs. could stipulate dead and down, standing dead, more than 100 feet from the river.	Alternative 3 would allow for chainsaw use in all RMZs for the cutting of dead and down wood and standing dead at least 200 feet from the river's edge. The BLM will modify Alternative 2 to allow for chainsaw use in RMZ 5 for dead and down wood and standing dead at least 200 feet from the river's edge. The BLM believes that 200 feet would protect scenic resources, while still allowing for the responsible cutting of dead trees for firewood.
41	I very much disagree with the banning of chainsaw use in this area. Alternative #3 would allow chainsaw use beyond 200 feet from the river and I agree with this limitation. The cutting of green trees should never be done. Besides, they do not burn. Why cut something that can't be used for firewood? The removal of dead wood in the forest reduces forest fire danger. Fewer forest fires will reduce carbon emissions into the atmosphere and lessen greenhouse warming. Likewise, the use of chainsaws on dead trees is necessary and not harmful to aesthetics if done 200 feet beyond the river edge.	Thank you for your support of Alternative 3. Also, please see response to comment # 39.
52	With regard to chainsaw use...liberalize (lessen) governmental intrusion on the rights of Alaskans choosing to exercise their right to harvest foodstocks for personal consumptive use.	Please see response to comment # 39.
62	Chain saws should not be allowed in Zones 1, 2, 4, and 5.	The use of chainsaws in RMZs 1, 2, 4, and 5 would be prohibited in Alternative 4.
68	...BLM proposes to prohibit chain saw use for firewood gathering for Zones 4 and 5. I agree that live trees should not be cut. However, the blanket prohibition on chainsaws is just plain dumb. If one is going to use the valley for hunting, considerable quantities of firewood will be required. If chainsaws are used to gather the wood from either downed or standing dead trees, what is the harm? Alternative 3 provides a much more realistic alternative regarding chain saw use.	Thank you for your support of Alternative 3.
RECREATIONAL SHOOTING		
03	We very much support the proposed general prohibition on...recreational shooting...	Recreational shooting is prohibited in Alternatives 2, 3 and 4.
23	I can agree with firearms use restricting plinking. I also realize this area is not the most appropriate for target shooting. However, in 25 years of utilizing this area, on two occasions, a party member or I have had to take a target shot, after having a rifle drop, to verify the gun's accuracy. This would appear to be a violation under the Alternative 2. Some provision needs to be included to keep this from being an illegal act.	Violations of prohibited acts depend upon the discretion used by authorized law enforcement personnel. It is the intent of the BLM to prohibit recreational shooting associated with plinking and excessive target practice. Clarification will be made in Alternative 2 in the EA that the use and discharge of a weapon will be allowed for the purposes of lawful hunting or trapping, defense of life and property, or for a signaling device in emergencies.

COMMENT #	COMMENT	BLM RESPONSE
35	No target shooting...is a good thing!	Please see comment # 03 in this section.
52	With regard to...necessary shooting for sight-in purposes and harvesting game, liberalize (lessen) governmental intrusion on the rights of Alaskans choosing to exercise their right to harvest foodstocks for personal consumptive use.	Please see comment # 23 in this section.
62	Recreational shooting...should not be allowed.	Please see comment # 03 in this section.
FIREWORKS		
03	We very much support the proposed general prohibition on fireworks...	Fireworks are prohibited in Alternatives 2, 3 and 4.
27	Prohibit fireworks.	Please see comment # 03 in this section.
35	No...fireworks is a good thing!	Please see comment # 03 in this section.
62	...fireworks should not be allowed.	Please see comment # 03 in this section.
SUPPLY CACHING		
52	With regard to...caching of supplies...liberalize (lessen) governmental intrusion on the rights of Alaskans choosing to exercise their right to harvest foodstocks for personal consumptive use.	In all alternatives, the caching of supplies is allowed with prior BLM written authorization.
SPECIAL RECREATION PERMITS		
10	Commercial berry-picking. This activity has been proposed in the area in the past. This should not be allowed either in the corridor or outside it. Berries have been and continue to be a very important subsistence resource, as well as a great source of pleasure for others. The EA should state that commercial activities not related to the purposes for which the area was designated, or to its ORVs, including but not restricted to commercial berry-picking, are prohibited. Competitive events are inconsistent with the corridor's generally natural, wild character, and the experience of solitude, and should be prohibited in most of the corridor. Perhaps some such events would be appropriate, on an ad hoc basis, on Round Tangle.	Please see comment # 23 in this section.
21	I support a maximum group size of eight for all SRPs in all zones as outlined in Alternative 4. The Delta River User Survey states that the mean largest tolerable group size is 8.1. It is also stated that "some of the data shows that on some segments of the river, current use levels are causing unacceptable change to the experience the user and impacting natural and primitive character of the river." The Draft also states, on page 63, that "typically commercial groups have a larger group size than private groups" and "there was support among non-motorized users for limiting commercial use, and there was more support than opposition among motorized users." Also on page 101 it states that "commercial recreation applications will likely increase." Guided trips are more intrusive. All of the above statements, particularly the Delta River User Survey 8.1 mean tolerance level, aim to putting a group size limit of 8 on commercial use. Considering there is only one permitted group, it will be easier to impose the limit now rather than when there is established use at a larger size. I value this limit on commercial use group size over limits on personal use group sizes.	Thank you for your support of Alternative 4.

COMMENT #	COMMENT	BLM RESPONSE
23	Any management alternative selected should carefully consider effects of and the regulation of industrial tourism. Commercial tours/guiding can put heavy repetitive use in an area and crowd out Alaskans or independent travelers to the area. Consider the change in the Klutina River use near Copper Center 1985-1995 vs 2000-2010.	Commercial uses are monitored within the river corridor and require the issuance of a Special Recreation Permit (SRP), with associated stipulations to protect river resources. At this point in time, there is only one permitted commercial SRP. Monitoring of commercial uses will continue in all alternatives, and associated management actions and permit stipulations will help to mitigate the effects of permitted commercial uses within the river corridor.
31	This entire corridor is a real treasure and I hope BLM really manages it for non-commercial recreation as the highest and best use.	Please see comment # 23 in this section.
41	I would prefer not to see commercial use of the river but, if it must happen, limiting group sizes to a maximum of 8 would be reasonable. Larger numbers have much greater impact than their incremental size increase.	Thank you for your support of Alternative 4.
62	BLM's management of this area should be limited to: Management of commercial enterprises including guiding. Commercial activities other than guiding should not be allowed. Guiding should not be allowed in Zones 1 and 4.	Please see comment # 23 in this section. At this point in time, BLM believes that the low levels of commercial use do not warrant a prohibition on guiding in RMZs 1 and 4 and that the proposed management actions in Alternatives 2, 3 and 4 provide the necessary stipulations for reducing impacts associated with commercial groups.
GROUP SIZES		
21	I support a maximum group size of eight in all zones as outlined in Alternative 4. Reasons I support this limitation mirror those stated below related to SRP group size but also relate to the impact of a large group on the recreational experiences. Esker ridges are great places to camp and afford spectacular views. But five to seven tents will stand out on an esker ridge as a "tent city" compared to smaller numbers. Can the average campsite in the Tangle Lakes and the Delta River support a group as large as ten people? I can think of many campsites that would expand if a group of ten people were camping at it. On page 56 it is states that the current average group size was 4 for the Delta River through trip and 3 for Upper Tangles. On page 57 it states that there are sections of the Upper Tangles and the Delta River where a user is already experiences higher use and development than is preferred. Page 58 "at current use levels, users' abilities to experience a primitive or semi-primitive river trip on certain segments are being impacted." If that is occurring with an average group size of 4 then setting the group limit at 10 would only allow more use/developed experience. I recognize that group size is not the only thing impacting the user's experience but here is an opportunity to use a pro-active management decision to keep group size, and thus its impact on user experience, within user tolerances. On page 59 a recreation management concern was the establishment/discussion of creating a carrying capacity for the Delta. If users' experiences are being negatively impacted then the BLM has their numbers to being the discussion of carrying capacity for the system. Since we are managing for a different recreational experience in the different zones, has the BLM considered changing the group size limits based on the zones? Yes, this approach would be more confusing to the public but it would allow a larger, more family oriented experience in the Zones 2, 3,and 5 while giving the more primitive zones and smaller group size thus preserving that experience. While this would not be my first choice, it would be better than a group size of 10 across the board. Again I would like to stress that when the users of the Delta River were asked their specific tolerances for group size their response was 8. So why is the BLM going higher than that? This is one opportunity for the BLM to recognize the spirit of Benefit's Based Management. Ask the user what they want. What is their experience out there? Are they are happy with their experience? Then the BLM can set the management prescriptions at the level to maintain or enhance the users' experiences. The users said eight at a	Thank you for your support of Alternative 4. In creating a reasonable range of alternatives, the BLM intended to assess the effects of implementing different group size limitations between the alternatives, based on a variety of factors including campsite impacts (soils and vegetation), scenic impacts, and social encounter rates. The group size limitations are the maximum number of people per group that would be allowed. This does not necessarily mean that this number is the same as the average group size. The BLM's intent is to manage the targeted recreational setting of each RMZ for the average group size, even though the allowable maximum group size will occasionally occur. Figure 2 on page 66 of the EA shows that the mean, or average tolerable group size was 8.1 people. The table also shows that large majorities (86%) will tolerate groups no larger than 12, and almost all users (98%) indicate a tolerance for less than 20 people. The BLM believes that a majority of the campsites on the lakes and river are able to accommodate up to twelve people, and that reductions in group size between alternatives will further protect campsite resources, lower social encounter rates, and reduce scenic impacts. A campsite map will allow larger groups to identify sites that are suitable for their group size. The renovation of the Tangle Lakes Campground will develop campsites that are capable of accommodating up to 12 people and 3 vehicles per site, which is the maximum proposed group size among all alternatives. The BLM believes that creating different group size limitations for each RMZ would not be in the

COMMENT #	COMMENT	BLM RESPONSE
	HIGHEST level of tolerance. Why go higher? It is also good to keep in mind that if any group wants to be larger than eight people they can contact the BLM to gain written authorization as stated in Alternative 2. Group size related to use in the Tangle Lakes Campground, page 27, should be dictated by the size of the campsites within the campground and campground supplemental rules. Ten people at a campsite seem like a large number considering that would require at least, if not more, than two vehicles. Also, at a campground, users have the option to simply occupy two sites. Again, why encourage such a large group when it is not currently the norm?	best interests of educating the public regarding new regulations, and that enforcement would be problematic. The effects of campsite management are discussed in the EA on pages 94-96 (cultural resources), pages 100-105 (recreation resources), pages 105-107 (scenic resources), pages 107-108 (soil resources), pages 111-113 (vegetative resources), and pages 113-115 (water quality).
22	Group size of 15 or less...needs to be better managed.	Alternatives 2, 3, and 4 propose group size limitations of 10, 12, and 8, respectively.
27	You accurately state that families and groups have historically use the area, yet on page 17 it states "Manage for an average group size of 3 to 5 people." I recommend a group size of at least 12 so that extended families or two or three families can camp together. Their kids would really appreciate this. Also it would allow a Boy Scout patrol to camp together with their leaders. Same for Girl Scouts and other youth groups.	Alternative 3 proposes a group size limitation of 12 people. The group size limitations are the maximum number of people per group. This does not necessarily mean that this number is the average group size. The BLM's intent is to manage the targeted recreational setting of each RMZ for the average group size, even though the allowable maximum group size will occasionally occur.
66	I don't much care about the size of the groups allowed at the campground because it's across the lake and we don't hear noise from the campers.	Thank you for your comment.
USER CAPACITY MANAGEMENT		
62	Capacity management should be limited to limiting the number of days that can be spend at any one campsite and limiting group sizes. This could vary by zone. Reservation systems implemented should be limited to those controlling the number of guided parties. A reservation system to limit the number non-commercial users should not be implemented under any scenario.	Alternatives 2, 3 and 4 propose limitations on group sizes and occupancy, as well as an adaptive management approach to address user capacity. This approach was designed to address increased user capacity by implementing the least restrictive measures first, followed by more restrictive measures, based on monitoring defined indicators and standards. The BLM believes that this approach of implementing a voluntary registration system before a mandatory registration or mandatory permit system is the most appropriate way to deal with potential user capacity issues that may develop in the future. Guided parties account for less than 5% of overall use within the river corridor, and BLM believes that arbitrarily limiting commercial use at such low use levels would not be an effective way to deal with user capacity. Since non-commercial use accounts for more than 95% of all river use, any limits to user capacity would likely be the result of increased non-commercial users, rather than commercial groups. Limiting commercial use in this situation would do little to address the overall user levels in the river corridor.
FACILITY MANAGEMENT		
08	Improvements to the area could always be done. We really like what was done on the North side of the highway on the wayside there. Upgrades to the area with facilities is always a good thing, in our opinion. It would be great to see a little more enforcement around the Tangle Lakes Area, mostly on big holiday weekends.	Increased law enforcement patrols on holiday weekends and during fall hunting season have been a priority of the BLM for many years.

COMMENT #	COMMENT	BLM RESPONSE
10	We support the DEA's proposal to minimize facility development.	Thank you for your comment.
22	We would like to see limited development in the more remote sections, i.e. no constructed gravel strips along the gravel bars.	None of the alternatives propose the construction or authorization of gravel landing strips.
24	There really is no need for any "Improvements" or enhancements. The Delta River gets surprisingly few travelers that navigate the entire river to it's takeout point at Mile 212 on the Richardson Highway. This is why it is so well liked by the few people that travel it during the summer months. Lets keep it that way! I would also like to comment on the wayside/boat launch at the East end of Upper Tangle Lakes. For many, many years this wayside was also a camping area. It was small, with maybe 7-9 campsites. A couple of years ago it was changed to a "Day Use Only" area and I believe that was poor decision. I can't tell you how many people have told me how disappointed they are to find that they can no longer camp in spot that they, their parents and grandparents had been using for many years. It would be a benefit to change this back to a Camp ground.	Alternative 4 proposes the fewest new facility developments in the river corridor. The Delta Wayside was closed to overnight camping in 2006 due to soil and vegetation impacts from developed camping and motor vehicle contaminants that were entering the Tangle River as a result of motorized vehicles parking next to the riverbank.
41	The idea of constructing public use cabins in the lower river contradicts your past burning down of cabins.	Alternatives 2 and 4 do not propose the construction of new public use cabins within the river corridor.
62	BLM's management of this area should be limited to: Development, management of, and maintenance of a new campground at the site of the existing Tangle Lakes Campground. Management of and maintenance of the existing wayside at the outlet of Upper Tangle Lake. Management of and maintenance of portage trails at the falls in Zone 4. An outhouse should not be provided at the portage. Development of, management of, and maintenance of campsites.	Alternative 4 best supports your comments in regards to facility development. Alternative 4 limits facility development to the campground renovation only; the wayside and portage trails would be maintained, the outhouse would be removed at the portage (based on a mandatory portable toilet requirement), and campsites would be managed and maintained for a low density recreational experience.
66	There's no question the Campground needs to be renovated, but I oppose opening any trails, walk-in camp sites or special use cabins outside the boundaries of the Campground. The tundra is too fragile, the wild life is too delightful and too many people already do not respect our private property signs. Fees should only be charged for use of the Campground. I am opposed to any fees being charged for use of the Wayside, boat launches or parking.	Alternative 4 limits facility development to the campground renovation only. Walk-in trails, cabins, and user fees for facilities other than the campground are not proposed in Alternative 4.
EDUCATION, INTERPRETATION AND MARKETING		
01	BLM should provide bear-resistant containers in all campgrounds where bears are known to be present and offer bear education (Bear Aware?) such as the BLM managers provide to users of the Campbell Tract facility in Anchorage.	All of the trash receptacles currently available at the Tangle Lakes Campground are bear-resistant trash receptacles. After the redesign of the Tangle Lakes Campground, bear resistant food containers will also be installed throughout the campground. Education regarding bear safety will be a component of the educational outreach proposed for all alternatives.
10	We appreciate BLM's intent to include in these materials an explanation of the need for use restrictions (see, e.g., p. 22). Unfortunately, reasonable restrictions are absolutely essential in order to protect the values for which the area was designated. Already, the corridor and surrounding lands are enjoyed by many Alaskans and visitors for a wide variety of purposes. One of its major attractions is that it is nevertheless relatively uncrowded compared to some other popular destinations. Further marketing is not needed, and if undertaken would only degrade rather than enhance the area. At least in the focus group we were a part of, virtually everybody felt that aggressive marketing was a very bad idea. The DEA says that for Zones 1, 4 and 5 marketing would be done through the website and brochures. This is appropriate, and entirely adequate, especially considering how much most people rely on website	Please see response to comment # 55 in this section.

COMMENT #	COMMENT	BLM RESPONSE
	information these days. For the two other zones, it is said that they would be "widely marketed and will include information on the BLM website, brochures, and interpretative displays." We think all three of these methods are appropriate, but believe that going beyond them is both contrary to what the public wants and likely to prove detrimental to the resources and values the Wild and Scenic River designation is meant to protect.	
29	From my experience over the past couple of decades this river has relatively low usage, however, BLM finds it necessary to advertise and promote the usage of the river which could potentially result in increased usage and problems that they are now trying to control. It really doesn't make since to market this river and create a situation that doesn't already exist.	Please see response to comment # 55 in this section.
35	...increased education is clearly appropriate.	The BLM agrees. Alternatives 2, 3 and 4 all propose increased educational efforts throughout the river corridor.
39	PAC believes that advertising done for any one of the Zones will affect all of the Zones to varying degrees. Usage of the Tangle/Delta River has not appreciably changed over the past 10-15 years. Wholesale advertising of any portion of the DWSR could conceivably change that to some unknown degree. We believe that the very qualities that are "Wild and Scenic" could be compromised. No to major advertising.	Please see response to comment # 55 in this section.
41	Respect by all users in the use of fire rings and waste disposal is an educational imperative you need to undertake.	The BLM agrees. Alternatives 2, 3 and 4 all propose increased educational efforts regarding fire rings and waste disposal.
55	While we fully support providing opportunities for public use of conservation system units such as the Delta Wild and Scenic River, the focus of the entire plan appears inconsistent with the concept of "marketing" the area. The plan seems to push for minimal usage of the area, while the purposes of marketing are to increase awareness and ultimately increase desire to visit the river area. As we point out above, the 2006 user survey indicates that public use has remained relatively unchanged since the early 1980's. Marketing the Delta will likely increase public use, resulting in additional restrictions and use limitations necessary to achieve the "desired outcomes" proposed for the various zones under the BBM concept or to avoid perceived conflicts between various user groups. The final EA and plan amendment must address this obvious contradiction.	While marketing may increase overall use to some extent, the BLM is obligated to provide the general public with information about available recreational opportunities on public lands. However, the BLM does believe that the level and type of marketing can be tailored to each RMZ to convey the overall setting character that is being targeted. In areas that are targeted for primitive and semiprimitive experiences where the concentrations of users is relatively low, the level of marketing and delivery methods would be commensurate with these targeted outcomes. In areas where the setting character prescription is for higher levels of use, marketing would be offered to a wider audience and through additional delivery methods.
62	BLM's management of this area should be limited to: Public education regarding no trace camping. Enforcement of rules.	Thank you for your comment. Public education regarding Leave No Trace camping and enforcement of rules are prescribed for Alternatives 2, 3, and 4.
WATER QUALITY		
01	Conduct baseline and ongoing sampling of water quality and aquatic invertebrates. BLM proposes to monitor water for petrochemicals (motorboats, aircraft and snowmachines) but it should also sample for nickel, copper, and other chemicals that might result from mineral exploration and development. Aquatic invertebrates such as mayflies and stoneflies are important to fish and are indicators of water quality.	Please see response to comment # 21 in this section.
10	Water quality within the corridor could well be affected by a mine, or even by exploration. It is important that baseline surveys of water chemistry and aquatic invertebrates be done now, and monitoring should continue. In addition to nickel, copper, and drilling mud chemicals, there is a whole suite of chemicals that	Please see response to comment # 21 in this section.

COMMENT #	COMMENT	BLM RESPONSE
	should be tested in order to establish baseline water quality. This testing would be a very important contribution that BLM could make to protecting the corridor and surrounding lands.	
21	There is a discussion on pages 76 and 77 regarding the testing of the water quality for the Delta River and potential impacts to water quality from recreational activities. I am concerned that there are no systematic water quality actions being taken by the BLM currently and none are outlined in this Draft plan. It is clearly stated the human waste, resulting in fecal coliform in the water, and hydrocarbons from motorized boat use are present in the system. It is also stated that the fisheries of the area are excellent, a direct correlation to the water and habitat quality water provides. The potential for large scale mining activity on surrounding State land is another important reason to get baseline water quality data now. Should that mining develop, and should it alter the water quality of the Delta system, they will require you to be able to show a change of the quality scientifically. We need the baseline data for the entire Delta system to prove that a change has taken place. Pages 22 and 34 under management states that "BLM will periodically monitor water quality . . . " This wording is vague and does not hold the BLM accountable to conduct the water testing. Plus it only addresses water testing in two of the zones. The scope of the outlined water testing is not sufficient. I recommend that the BLM develop a water quality monitoring plan for the Delta that will be systematic and comply with State water quality standards. What better time to get baseline data than when there doesn't seem to be an issue with the quality of the water? Baseline data is often what is missing and is a valuable tool for scientifically documenting any changes in the water column that could provide solid data to support the implementations of regulations to address water quality issues. The summer river patrols could easily be trained to collect and compile this water quality data throughout the Delta Corridor. The water is what makes the Delta a place of interest. Every aspect of the recreational use of the area is linked to the water. It is paramount to maintain a high quality resource.	Water quality management actions that were developed in the East Alaska Resource Management Plan (EARMP) will apply to the DWSR corridor and will not be changed. Page 4 of the Draft EA states: "New decisions that will be made as part of the Delta River SRMA Plan and EARMP Amendment will be analyzed in this EA. These decisions will apply to recreation management and only for BLM managed lands within the DWSR corridor and Delta River SRMA. Decisions made in the EARMP for other resources within the planning area will not be changed and will also be incorporated into the revised DWSR Management Plan". The water quality management actions that were developed in the EARMP to protect the watershed and riparian areas from a variety of potential contaminants, including petrochemicals and non-point source water pollution include: • Develop water quality data base in priority fish habitats and important recreation use areas to establish baseline for monitoring. In heavy use recreation rivers, include fecal coliform monitoring. First priority is Gulkana and Delta Wild and Scenic River corridors. • Continue assessment of riparian areas, using proper functioning condition assessment methodology. Priority areas include Wild and Scenic River corridors, ACECs, and riparian areas within anticipated or ongoing mining areas. • Continue to monitor water flows and develop web-accessed information for the Delta Wild and Scenic River. • Complete instream flow needs assessment documentation and obtain water rights for the Delta Wild and Scenic River. • Use Required Operating Procedures to prevent non point source water pollution when implementing projects. • Obtain appropriate permits pertaining to projects affecting water quality, wetlands, and/or streams prior to implementing BLM projects. • Require outside applicants to provide copies of pertinent permits prior to BLM authorizations.
27	I'm just curious, but how would you manage instream flow?	Please see response to comment # 21 in this section.
39	Water quality is a major concern; any drainage into the DWSR corridor that has, (or had), mining activity should periodically be monitored for potential contaminants.	Please see response to comment # 21 in this section.
	FISH AND WILDLIFE	
01	BLM staff should also record any observed reaction of wildlife to Pure Nickel's helicopter flights and other exploration activities.	Pure Nickel is currently conducting exploratory mining activities on State lands, not on federal lands. The BLM staff will strive to record observed reactions of wildlife to these activities whenever staff is present nearby. However, we recommend the public to

COMMENT #	COMMENT	BLM RESPONSE
		report observed reactions of wildlife to these exploratory activities to the State of Alaska, Department of Natural Resources.
10	We mentioned earlier that motorized vehicle and other artificial noises can be detrimental to wildlife. We'd only note now that in addition to local trappers, subsistence users, and other carnivores (p. 78), the corridor's small mammals and furbearers are of very strong interest to other human users of the area as well.	Thank you for your comment.
38	First off, the Wild segment of the DWSR runs from Garrett Creek to Phelan Creek. A few miles downstream from Garrett Creek is where Eureka Creek dumps into the Delta turning the water into a braided glacial river for the next 7 or so miles where it confluences with Phelan Creek. I have never seen a grayling caught on this section of the river. Secondly, I did some Google checks on Gryska, the source for which you have quoted. Everything that I could find on him in relation to this survey had to do with preparation work that he did for a James F. Parker. Parker wrote a Fishery Management Plan for Arctic Grayling in the Delta Clearwater River, 2001-2004; for the Alaska Department of Fish and Game, Fishery Management Report No. 03-02. The Delta Clearwater River is a 34 km river located 177 km southeast of Fairbanks and 23 km northeast of Delta Junction in the middle of the Tanana River drainage. These are two clearly different rivers with the same facts, "…greatest densities ever recorded for a population of arctic grayling > 270 mm length (Gryska, in preparation)". I am willing to take a guess that there is a mistake on BLM's part here. I found and read the report for the Delta Clearwater River but couldn't find any such reports on the Delta River. It is here that I have great concerns because of the BLM's suggestions that the use of OHVs crossing the river and the wake of power boats could disturb this great fishery of Arctic graylings based on the allege Gryska's finding for the Delta River.	The Alaska Department of Fish and Game and the BLM cooperated in a stock assessment of the Arctic grayling population inhabiting a 17-km portion of the DWSR. The study was conducted during July 2008 using a mark-recapture experiment to estimate abundance and length composition of the population. The density of Arctic grayling in the Delta River between 240 and 270 mm in fork length was the greatest ever observed among published density estimates for Alaskan riverine Arctic grayling (Gryska 2009). Andy Gryska with the Department of Fish and Game was the project lead. The report for this study has not yet been assigned a data series number and is cited as: 2009. Stock assessment Arctic grayling in the Delta River, 2008. Alaska Department of Fish and Game, Fishery Data Series No. 09-XX, Anchorage.
CLIMATE CHANGE		
02	The conclusion of the International Panel on Climate Change (IPCC) that "warming of the climate system is unequivocal" due to anthropogenic contributions of greenhouse gasses is becoming more and more open to question. This statement is not relevant. Climate change is accepted by virtually all scientists. However, anthropogenic sources are not seen as a problem by many. Furthermore an increasing number scientists that once accepted anthropogenic as a major contribution no longer support that view. Man could have had very little to do with the beginning or ending of the numerous interglacial warming periods recognized in the Pleistocene. Several much better explanations exist. Land managers would be better advised to accept the fact that climate change is with us to stay (both warming and cooling and wet periods and dry periods) and to develop management approaches that will encourage adaptation to those changes. 4.2.1.1.1 Effects of recreation management decisions to contributing causes of climate change. AMA agrees that none of the management alternatives would impact climate change. We disagree, however, that greenhouse gas emissions are the primary cause of climate change and this statement should be removed.	The Department of the Interior, Secretarial Order 3226, requires that the BLM "consider and analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, and/or when making major decisions affecting DOI resources". The BLM supports the view that the emission of greenhouse gases (GHG) is one of the contributing causes of climate change (but not the only cause), and that the impacts of climate change represent the cumulative aggregation of all worldwide GHG emissions and other climate drivers. The tools necessary to quantify incremental climatic impacts of specific activities are presently unavailable, so the climate change analysis for the purposes of this planning document are limited to accounting and disclosing factors that contribute to climate change. Specific levels of significance cannot be established, and data is not available to put GHG emissions into a meaningful context for the planning area, but assumptions can be stated that account for and/or disclose the factors that contribute to climate change associated with each alternative (including greenhouse gas emissions). The effects to climate change are discussed in the EA on pages 93-94.

COMMENT #	COMMENT	BLM RESPONSE
09	Finally, we think BLM must take into account how the Delta River management plan will mitigate and adapt to changes occurring as a result of climate change. Changes from this source are very likely to occur in fish habitat, water quality, vegetation composition, and wildlife. These changes are complex and perhaps even unknowable at this point in time. Nonetheless, it is clear that a more conservative approach to the protection regime of the area will not be a mistake given that, even if we do not know what the changes will be, we know there will be change and change is likely to be drastic. We urge you to err on the side of caution as you develop a plan that will, it is to be hoped, protect into the indefinite future one of the Interior's most well-loved recreational areas.	Please see response to comment # 02 in this section.
40	Similarly we are facing impacts from global climate change at an alarming rate here in Alaska. The EA should consider the impacts of climate change, and how the management plan might mitigate these impacts. The glaciers in the area are receding rapidly, there is less snowfall and cover, surface and ground water levels must certainly be dropping. What effects will these have on fish, wildlife, vegetation, recreation and subsistence activities?	The effects to climate change are discussed in the EA on pages 93-94. Also, please see response to comment # 02 in this section.
57	Also absent is consideration of future impacts from a warming climate and how the Delta River management plan will mitigate and adapt to changes in soils, fish habitat, water quality, vegetation composition, wildlife, and recreation and subsistence activities as a result of climate change.	The effects to climate change are discussed in the EA on pages 93-94. Also, please see response to comment # 02 in this section.
61	I believe all reference to climate change should be removed from the Draft Environmental Assessment (EA) for the Delta River. Specifically paragraphs 3.2.1 and 4.2.1. The science that the global warming theory was based on has been seriously called into question. The EA should not become a sounding board for either polarized group of this issue. Referencing climate change in this format from the Bureau of Land Management, a government agency, will only provide false validation. Others will use it to discredit the EA in its entirety. No matter what personal stance someone has on the issue it cannot be argued the potential climate change on the local area of use from fossil fuel combustion is trivial. Therefore, why include it in the assessment.	Please see response to comment # 02 in this section.
ACCESS		
02	3.2.4.1.2 Transportation and Utility Corridors. AMA supports BLM efforts to avoid road construction within and along the wild and scenic river corridor so long as "overland transportation systems within or across the river corridor may be authorized if it is determined that there are no economically feasible and prudent alternative routes."	On page 60, the EA discusses the process for authorizing additional access routes within the DWSR corridor. This process was developed in the ANILCA legislation and would continue to serve as the primary tool to assess overland transportation systems within or across the river corridor. The effects of authorizing additional access routes are discussed in the EA on pages 98-99.
10	Should a mine be developed, a mining road would presumably be constructed. The question of where such a road should be routed is not a simple one. If the road is to intrude on the corridor at all, it should do so for the shortest possible distance, that is, it should cross the corridor at right angles. Of course, not intruding on the corridor would be the preferred solution from the standpoint of the Wild and Scenic River only. But there are also highly valuable lands, waters and natural resources (like the Nelchina herd) outside of the corridor. It might be that a quick crossing of the corridor, rather than a lengthy traverse parallel to it, would be in the overall best interest of the larger area and its many resources. We just don't know at this point. And of course a similar issue might arise with regard to other utilities, such as a transmission line. In general, BLM should do whatever it can to persuade the State of Alaska to minimize the impacts of mining on activities and resources within the corridor, and this intention should be included in the EA.	Please see response to comment #02 in this section.

COMMENT #	COMMENT	BLM RESPONSE
	PROPERTY AQUISITION	
01	We support BLM's efforts to purchase the inactive Tangle Lakes Lodge land next to the Wayside, so that land along the lake doesn't become a subdivision.	Please see response to comment # 04 in this section.
03	It would be a shame to see further development on the Tangle Lakes Lodge property. BLM has indicated its willingness to consider purchasing that property to prevent inappropriate additional development. It should act now, while the property is for sale, in order to prevent the substantial scenic and noise impacts that would result from additional development there.	Please see response to comment # 04 in this section.
04	We support the purchase of the private in-holdings and lodge within the Wild and Scenic River Corridor. While the RMP, existing, and prescribed management recommends the purchase of these lands no action to date has been taken to secure ownership as these lots have become available for purchase. The ownership of these areas will allow for consistent management in the Delta Corridor. Please take decisive action as these lands become available to acquire ownership and management responsibilities.	The EARMP specified that the DWSR corridor would be an emphasis area for the acquisition of private lands through purchase or exchange for the purposes of long-term Federal management and retention. On pages 22 and 26 of the Draft EA, Property Acquisition, the BLM proposes that: "The BLM will consider acquisition of private parcels for sale within the zone for inclusion into the DWSR corridor". This would not change in any of the alternatives. There are approximately 30 acres of private lands within the DWSR corridor. If these parcels become available for sale, the BLM may submit funding requests through the Land and Water Conservation Fund (LWCF) to acquire lands. The LWCF program provides funding for the acquisition and development of public outdoor recreation areas and facilities. The BLM has considered, and does not support, the acquisition and development of a visitor center at the Tangle Lakes Lodge because funding is not available to maintain and operate additional assets that would require staffing, maintenance, and site remediation costs that may be necessary to fully comply with Federal inspection, accessibility, and building code standards. The effects of property acquisition are discussed in the EA on page 99.
06	I DO support efforts to purchase the inactive Tangle Lakes Lodge land next to the Wayside.	Please see response to comment # 04 in this section.
10	One of the single most important actions BLM could take in the corridor is to acquire the Tangle Lakes Lodge property, and prevent land along the lake from becoming a subdivision. Further development there, or the development of the presently raw land, would seriously degrade the scenic qualities which the agency recognizes are a major part of the Tangles/Delta experience. Ideally, BLM should purchase the entire property, but should there be fiscal or management constraints preventing such a purchase at this time, the agency should obtain as much of the property as it can, and seek to obtain the reminder as soon as possible.	Please see response to comment # 04 in this section.
14	If BLM were to purchase the Tangle Lakes Lodge property it would help secure the values of the Wild and Scenic River Corridor and I support that.	Please see response to comment # 04 in this section.
21	I support the BLM purchasing land acquisitions or private inholdings within the Delta WSR corridor either through the LWFC requests or even using regular budget monies. I agree with the reclamation of any acquisitions to VRM Class 1 natural state sites as noted on page 83 and 84. This intention of restoring all acquisitions to VRM Class 1 should be noted in Chapter 2 on page 26 under Property Acquisitions. These inholdings are along the Denali Highway where there is great potential for the subdivision of the land as	Please see response to comment # 04 in this section.

COMMENT #	COMMENT	BLM RESPONSE
	well as the development of activities that would adversely impact the current character of the area such are intensive guide services and adventure lodges operated by large corporations like Princess. I specifically support the BLM purchasing the old Tangle Lakes Lodge. It would be a great use of our tax dollars to purchase the old Tangle Lakes Lodge property and then tear it down and restore that area to its natural state.	
24	As several other concerned people remarked last time, however, there is one big concern that has unfortunately come to a head: I have tried for the past 6 years to negotiate a sale of my property to the BLM in order to protect it from further development, with poor results. After an exhaustive period of approximately two years, which included public meetings, BLM staff time and an expensive appraisal by BLM, the decision was made to not purchase the only private property at the headwaters of this river. This decision disappointed many people, including BLM staff, conservation organizations and everyday users of this River corridor. I had agreed to sell this property at whatever price the BLM appraisal came in at, so I was not trying to hold anyone hostage on the price. No reason was ever given for the BLM's decision not to purchase. I was very surprised to be told at a meeting with BLM that they do not care if I subdivide and make parcels available to private citizens. Unfortunately, that looks like what may happen. I will forever be disappointed that BLM made this decision and will never be able to understand it, especially since this also negatively affects public safety. For 100 miles anyway you want to travel, there is no BLM, medical assistance or law enforcement present in this area, with the exception of a few days each summer when BLM Rangers or State Troopers make a trip out here. In the meantime, there are fatal accidents (I once held a two year old boy for over an hour, who was badly injured until EMT's arrived at a traffic accident that had killed his Father and Grandmother) fish & game violations and just general mayhem at times. The property at Tangle Lakes Lodge would have been the perfect place to provide this much needed presence at a bargain price. Are there any plans in the future for BLM to have a presence in this area?	Please see response to comment # 04 in this section.
25	I also strongly support the effort for BLM to acquire the Tangle Lakes Lodge to prevent development. That roadside lake is too special to open it up to unrestricted use. The short river that connects that lake and Round Tangle is also special and should be protected. With its fragile nature and easy accessibility, it would be easy to imagine some knucklehead trying to power his way from one end to the other with a motorized craft of some sort. It would be inconceivable to me how damage to the system would not result. Preventing this type of disaster is much easier than repairing it! Help protect one of the special places in Alaska that offers road access!!	Please see response to comment # 04 in this section.
27	I strongly recommend against acquisition of one of the area lodges. This year early “baby boomers” turn 65. Many of them will want to enjoy the values of the Tangle Lakes area without having to camp out. The importance of the lodges to provide this opportunity will increase in the future.	Please see response to comment # 04 in this section.
32	I support BLM's efforts to purchase the inactive Tangle Lakes Lodge land next to the Wayside, so that land along the lake doesn't become a subdivision.	Please see response to comment # 04 in this section.
34	I also strongly support your acquiring inholdings, including the Tangle Lakes Lodge property.	Please see response to comment # 04 in this section.
39	While we are not opposed categorically to all government land acquisition within the DWSR corridor, we believe that sufficient notice of intent should be given and we would request that a hearing be held. Land acquisition has the potential to affect the local residents far more than it would an occasional area user. We believe that PAC and other affected organizations should have the opportunity to make their voices heard prior to any proposed land acquisition within the corridor.	The BLM agrees. In the event that any future land acquisition proposals are being considered in the DWSR corridor, a public meeting will be held in the affected are to solicit public comments on the proposal. This language has been added to Alternative 2 of the EA on pages 24 and 29. Also, please see response to comment # 04 in this section.
41	It makes no sense for the BLM, which now controls 44,587 acres of land, to use tax payer funds to purchase any private land in this area.	Please see response to comment # 04 in this section.

COMMENT #	COMMENT	BLM RESPONSE
50	Your efforts to purchase the inactive Tangle Lakes Lodge property, next to the wayside, are encouraged. Seeing the land become a subdivision would be sad indeed.	Please see response to comment # 04 in this section.
66	Whichever alternative is chosen for Zone #3, I am absolutely, unequivocally, unalterably opposed to BLM purchasing any private property on that stretch of the Denali Highway. There is so little private property in the area that it should all remain in private hands, no matter the condition of that property. At least once a year for the last 20 years we have received inquiries about selling our little one acre plot. Good Grief, BLM! You already own 248 acres in zone #3 and a total of 44,587 acres for the whole management area. If you want to build something, do it on your own land.	Please see response to comment # 04 in this section.
MINERAL DEVELOPMENT		
01	Large-scale mining activities in the area will have significant impacts to the natural resources, and though the BLM needs to accommodate the mining industry, it should clearly define the parameters and set the standards high enough to protect the resources befitting a wild and scenic designation. Our preference would be that no large-scale mining would occur in proximity to this area.	The planning criteria on Page 5 of the Draft EA states: "the plan amendment will only address recreation management and will supersede only those sections of the existing EARMP that relate to management of the Delta River SRMA. The plan will conform to all other decisions made in the EARMP". Page 4 also states: "New decisions that will be made as part of the Delta River SRMA Plan and EARMP Amendment will be analyzed in this EA. These decisions will apply to recreation management and only for BLM managed lands within the DWSR corridor and Delta River SRMA. Recreational decisions made in this plan will be incorporated into a subsequent revision of the 1983 DWSR Management Plan. Decisions made in the EARMP for other resources within the planning area will not be changed and will also be incorporated into the revised DWSR Management Plan". Lands within the DWSR corridor are withdrawn from mineral entry, and the BLM has no authority to regulate mining operations on state lands that are adjacent to the river corridor. To the extent possible, the BLM will work with the mining companies to address issues that affect users of the river corridor, but otherwise, mineral development and exploration is outside the scope of this planning process.
09	We are also greatly concerned about the current and future impacts of on-going mineral exploration in the Tangle Lakes and Delta River. Nevada Star's exploration may well mean more noise from helicopters or off-road vehicles as well as the noise and view of drill rigs just outside the corridor. We urge BLM to do it's best to mitigate for the "conflicts of interest" that are inevitable between recreational users and development interests. It is important to keep in mind that Nevada Star wishes to make money but they seek to do so on Alaska's land. We think BLM has every right to require that those wishing to develop our natural resources not take more than they have paid for in the form of impact on other users.	Please see response to comment # 01 in this section.
10	The DEA mentions this possibility under Cumulative Impacts at pp.100-101, but doesn't appear to describe how it would respond to such a threat. Mining on a large-scale on nearby lands poses a very significant threat to recreationists, hunters, and wildlife in the corridor, and possibly to water quality as well. BLM should do whatever it can to prevent activities beyond the corridor from adversely affecting resources and users within it. It would not be responsible stewardship to take a hands-off stance just because the mining activities are on non-BLM managed lands outside the corridor.	Please see response to comment # 01 in this section.

COMMENT #	COMMENT	BLM RESPONSE
12	I have canoed and camped along Tangle Lakes and the Delta River for 35 years, and have some concerns about possible damage to this special area in the future. In your revision of the plan, please include safeguards against damage to soil and water, and disturbance to wildlife, by exploration and other activities by mining companies (such as those proposed by Pure Nickel), in addition to other activities such as motorized recreation. Even if mining activities take place outside the wild and scenic river corridor, they can still affect this vulnerable area. Please include monitoring that will detect any potentially damaging by-products of these activities, and a means to prevent any damage before it happens.	Please see response to comment # 01 in this section.
13	I am concerned about the mineral exploration that is occurring in the Tangle Lakes and Delta River areas. Nevada Star Resources applied for a 2010-2015 exploration permit, but the Environmental Assessment does not take into account the impacts from the continued exploration. Some of these impacts include noise from the helicopters flying over the area and from the drill rig. The visual impacts of these activities are also undesirable for recreational users of the area. While the sights and sounds of mining activity are unpleasant for people who would like to have a wilderness experience, they do not compare to the negative impacts to wildlife and subsistence users from contamination of the water by seepage from unlined overflow pits. I request that BLM reject the permit.	Please see response to comment # 01 in this section.
22	Mining access should be limited to have the least amount of damage and visual impact to the recreational user.	Please see response to comment # 01 in this section.
30	Fully address the current and potential future impacts of mining exploration.	Please see response to comment # 01 in this section.
31	I do not support additional mineral exploration...	Please see response to comment # 01 in this section.
36	I would ask you extend every caution in permitting any mining or mining exploration within this river corridor. The Delta River is one of the very few wild and scenic rivers that are easily accessible to the public, and as such it needs all the protection it can get from large corporate interests.	Please see response to comment # 01 in this section.
40	Mineral exploration has greatly increased recently and the activity associated with it has negative impacts on the recreational activities in the area. Helicopter traffic is intrusive, drill rigs unsightly, and if mining actually begins a host of problems arise with roads, ore trucks, increased pressure on the resources from increased population, possible contaminated water from inadequately designed or maintained facilities, dust, noise, potential spills of toxic materials. In view of this I want to see the Environmental Assessment include impacts associated with mineral exploration and mining.	Please see response to comment # 01 in this section.
57	Excluded from discussion in the EA are cumulative current and future impacts of ongoing mineral exploration in vicinity of the Tangle Lakes and Delta River. The sight and noise of helicopters flying low over the corridor, as well potential impacts of noise from drilling and possibility of water contamination affecting wildlife, fish, and the health and desirability of those resources for subsistence and recreational users if contaminated are worth consideration.	Please see response to comment # 01 in this section.
59	I request that any revision does NOT include mining in any of the lands with waters that flow into the Delta Wild and Scenic River, particularly above Eureka creek. Mining and its continuous, long lasting and insidious waste products are not conducive to fish and other natural animals or vegetation. Also it is not esthetically pleasing in a Wild and Scenic River.	Please see response to comment # 01 in this section.
63	Alaska cannot afford to learn (or not learn) another lesson about the impacts of mine waste seeping into fish rich waters. I hope that you will look at making clear rules for mine tailings and waste for future mines.	Please see response to comment # 01 in this section.

COMMENT #	COMMENT	BLM RESPONSE
67	The management plan should more fully consider the current and future impacts of the mineral exploration that is going on in the surrounding environments around the Delta River Wild/Scenic & Recreational Corridor. What impacts are likely considering the continued exploration and how can these impacts be mitigated, reduced or eliminated? Of particular importance are the possibility of contaminated water seepage from unlined overflow pits. But, also of importance are impacts associated with noise, overflights and impacts upon subsistence & recreational users, as well as impacts upon wildlife. What are these impacts and how can they be avoided?	Please see response to comment # 01 in this section.
SUBSISTENCE/ANILCA 810 EVALUATION		
56	Many elements of the Delta River Plan are not consistent with ANILCA. In the understandable effort to conform to BLM's national planning standards and practices, it appears the agency has overlooked or misunderstood several essential statutory mandates in ANILCA concerning certain public uses and how those uses may be closed or restricted. As a federal law, ANILCA cannot be trumped by national or regional administrative practices. If planning tools conflict with ANILCA, the provisions of ANILCA must prevail. The most notable example of this concern is Benefits Based Management. BBM was designed outside of Alaska exclusively for managing recreation; yet in Alaska, recreation is often difficult or impossible to distinguish from subsistence or other traditional activities expressly provided for in ANILCA. Similarly, ANILCA and its implementing regulations dictate a specific process for restricting subsistence uses and traditional activities. ANILCA sets a higher bar for public use restrictions in Alaska and calls for a more rigorous implementation process. In this light, many of the proposed public use limits would be legally questionable in Alaska. The discussions that follow explore these challenges in more detail. **Inadequate Standards for Restrictions** ANILCA Section 811 states the Secretary shall ensure all rural residents engaging in subsistence activities shall have reasonable access to resources on public lands and shall permit [allow] snowmobiles, motorboats, and other means of surface transportation traditionally employed, subject to reasonable regulation. Similarly, ANILCA Section 111O(a) provides that the Secretary shall permit [allow] the use of snowmachines, motorboats, airplanes and non-motorized surface transportation on CSUs in Alaska, subject to reasonable regulation. Section 111O(a) requires that applicable methods of access can only be restricted by reasonable regulation if the "Secretary finds that such use would be detrimental to the resource values of the unit or area." This intent is further clarified in implementing Department of the Interior regulations at 43 CFR Part 36. While Section 111O(a) does not apply to most lands in Alaska managed by BLM, it does apply to the Delta Wild and Scenic River corridor as a designated conservation system unit. The Plan proposes restrictions on allowed uses without a finding that these uses are detrimental to resources or other values. Restricting use to preserve desired outcomes and subjective experiences is contrary to ANILCA's intent to allow access to Alaska's remote areas until resource values are threatened. Following passage of ANILCA, BLM did not promulgate ANILCA Section 811 implementing regulations as did the U.S Fish and Wildlife Service (FWS) and National Park Service (NPS). At the time, BLM was not contemplating the need to restrict access for subsistence activities, so such regulations were not a priority. However, using the same basic standards for restricting subsistence access as specified in 50 CFR 36.12 and 36 CFR 13.460 would provide consistency among DOI agencies in implementing ANILCA and maintain a consistent approach for the public's benefit. Both the FWS and NPS regulations state that routes and areas may be restricted or closed to the use of snowmobiles, motorboats, dog teams, and other means of surface transportation traditionally employed when "such use is likely to cause an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species, or the purposes for which the [area] was established." These long-established criteria have worked well for NPS and FWS. The overarching statutory guidance applies equally to all agencies, making it difficult to understand how BLM can justify a different approach. Emulating the NPS and FWS criteria would also serve BLM well,	**Inadequate Standards for Restrictions** **Inadequate ANILCA Closure Procedures** **Section 111O(a) "Traditional Activities "** **Section 811 "Qualified Rural Resident" and "Other Means of Surface Transportation"** After additional consideration, the BLM agrees that the BLM would be required to first determine that motorized boating and airplane landings would be detrimental to the resource values of the unit before restricting access that is subject to ANILCA Sections 111O(a) and 811(b), and that any restrictions under ANILCA Section 1110(a) would have to be in accordance with the process established in 43 CFR 36.11. At this point in time, the BLM believes that the current level of motorized boating use and airplane landings in RMZs 1 and 4 do not warrant an ANILCA closure. Therefore, Alternative 2 will be modified to include a monitoring strategy for specific resource values to determine if these uses are detrimentally affecting the specified values in RMZs 1 and 4. This will allow the BLM to monitor levels of use and impacts before implementing an ANILCA closure, if monitoring shows this is necessary in the future. **ANILCA Section 810 Analysis** Alternative 2, Wildlife. Permit requirements for motorized boating in Alternative 2 have been removed. Permit requirements for OHVs over 2,000 lbs. GVW is proposed for RMZ 5. Unlike some State Controlled Use Areas where OHVs are completely prohibited, this provision allows subsistence users and miners to still have access to natural resources. Hunters can acquire the free permits for OHVs over 2,000 lbs. at the time they get their subsistence permits. The BLM believes that these free permits will allow monitoring of impacts from OHVs over 2,000 lbs. in RMZ 5. Alternative 2 and 4, Wildlife. Dispersed camping is allowed for subsistence users. Subsistence users will not be limited to designated campsites. The mandatory camping permit system for designated campsites in Alternatives 2 and 4 would only be used if the voluntary registration systems are not successful. Developing a mandatory permit system would include an additional public process and opportunities for input.

COMMENT #	COMMENT	BLM RESPONSE
	including minimizing the potential for legal challenges. In summary, ANILCA imposes requirements regarding restriction of access under ANILCA Sections 111O(a) and 811(b). While it may be appropriate for BBM policy to inform the planning process, alone it does not serve as adequate justification to restrict public uses and access allowed for in statute. Restrictions without adequate justification pursuant to ANILCA constitute unreasonable regulation. **Inadequate ANILCA Closure Procedures** The plan indicates special rules will be developed in accordance with 43 CFR 8351.2-1 to address restrictions on travel management. As previously noted, access protected under Section 111O(a) can only be restricted by reasonable regulation if the Secretary determines such use would be detrimental to the resource values of the unit or area. Department of Interior (DOI) ANILCA regulations at 43 CFR 36.11 (h) include a process for implementing restrictions to these allowed uses that is not reflected in 43 CFR 8351.2-1, including specific notice and hearing requirements, an added rulemaking, and a minimum sixty-day comment period for permanent closures. Restrictions on airplane use also require added notice in specific publications. The Supplementary Information included in the Final Rule dated September 4, 1986 states: "Regulations providing for the closure of areas for reasons other than under the provisions of section 1110(a) include: For the NPS, 36 CFR 1.5; for the FWS, 50 CFR 25.21; and for the BLM, 43 CFR 8364." [Emphasis added] While 43 CFR 8351.2-1 may be appropriate to implement other management actions, the appropriate regulation for implementing Section 1110a) access restrictions is 43 CFR 36.11. The process followed by the FWS and NPS for restricting subsistence access is specified in Section 811 implementing regulations at 50 CFR 36.12 and 36 CFR 13.460, respectively. The Preamble in the June 17, 1981 Final Rule for 50 CFR Part 36 relative to Section 36.12, Access for Subsistence Purposes (page 31824), states: "All routes and areas are open to use of these vehicles for subsistence purposes except as specifically restricted or closed. The Refuge Manager will implement such closures or restrictions on the basis of criteria which are more limited than the criteria for closure to general recreation use. Basically, in order to impose a restriction, the Refuge Manager must determine that the use in question is causing or is likely to cause an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species or the purposes and values for which the refuge area was established. The Refuge Manager will arrange notice and public participation concerning closure proposals in order to involve those affected to the fullest extent possible in the decision making." [Emphasis added] For consistency with the intent of ANILCA and for the public's benefit, we request that BLM implement an equivalent public process when restricting subsistence access to meet the intent of ANILCA and avoid potential legal challenges. **Section 111O(a) "Traditional Activities "** The draft plan does not demonstrate an adequate understanding of the breadth and consequences associated with the term "traditional activities." For example, under certain alternatives, the plan proposes to require a permit for those seeking access for traditional activities in zones 1 and 4 during June and July. Specifically: During June and July, motorized boating and airplane landings will be prohibited. During the closed season, subject to reasonable regulations and with BLM authorization, qualified rural residents may be permitted to use motorized boats or other means of surface transportation traditionally employed for subsistence purposes (ANILCA Sec. 811). Similarly, access via motorboats, airplanes and nonmotorized surface transportation may also be permitted for traditional activities (ANILCA 1110). Authorization may be obtained in person, by mail, and by phone from BLM Glennallen Field Office. [Emphasis added] We appreciate that BLM is attempting to create an allowance for such traditional activities; however, in practice the plan is creating a restriction. First, while ANILCA Section 1110(a) specifically authorizes the use of certain modes of access for "traditional activities," the implementing regulation at 43 CFR 36.11 broadens this authorization and does not require a "traditional activity" criterion for use of motorboats and airplanes. The Supplemental Information for the Final Rule states: "Some commenters criticized the proposed regulations on motorboat and aircraft use within areas, in that those uses are not restricted to traditional activities and travel to and from villages and homesites as in the statutory authorization. These commenters preferred the more restrictive language of the statute. Interior is of the view that it has the	Alternative 4, Wildlife. The ANILCA 810 Analysis has been updated to explain why horsepower limitations and the prohibition of airboats and hovercraft "do not pose an added burden to subsistence users" and "...will not have an effect on subsistence uses and needs." Adaptive management actions have also been included in the revised analysis under “other resources”. **Clarifying the State's Role regarding Fish and Wildlife Management** The BLM acknowledges the State’s responsibility in the conservation of fish and wildlife resources in the State of Alaska. References in the text to a federal subsistence hunting area does not preclude these responsibilities of the State, but rather, highlights the availability of such areas where federally-qualified rural residents may take subsistence resources using a federal subsistence permit. ANILCA 810 Evaluation, pages 139-144. Information on caribou harvests are now included. EA, Chapter 4.3.9.1, pages 109-110. The BLM agrees that federal subsistence priority is a priority opportunity to harvest subsistence resources in times when resources may be limited such that the harvest of said limited resources necessitates closure of other harvest opportunities by non-federally-qualified subsistence users.

COMMENT #	COMMENT	BLM RESPONSE
	discretion to broaden the authorization beyond that required in the statute in light of other authorizations.... Accordingly, to allow for access to the areas, the restrictions on motorboat and fixed wing aircraft use have not been increased in the final regulation." Therefore, pursuant to 43 CFR 36.11, the reference to "traditional activities" is not necessary in this context. In addition, requiring a permit, regardless of how easily obtainable, is still a restriction (a burden on the public) and - as recognized by both NPS and FWS - the standard for 1110(a) access applies. As previously noted, BLM is required to first determine that such use would be detrimental to the resource values of the unit or area before restricting such use in accordance with the process established in 43 CFR 36.11. Second, BLM's use of the term "traditional activities" in the context of a restriction implies that BLM has either informally defined the term internally, and retains the right to not issue a permit on that basis; or is putting the burden upon the individual user to somehow define what use is traditional for BLM. Either way, this approach is problematic. The term was intentionally not defined by DOI in ANILCA or in Section 1110(a) implementing regulations at 43 CFR 36.11 with the expectation that the managing federal agency may define the term as needed on an area basis. The Supplemental Information for the Final Rule states: Some commenters suggested that a definition of "traditional activity" should be included in these regulations... Because these regulations apply to a number of areas under the administrative jurisdiction of three agencies, it has been decided that it would be unwise, and perhaps impossible to develop a definition that would be appropriate for all areas under all circumstances. Exactly what "traditional activities" are must be decided on a case-by-case basis. Once the agencies have had the opportunity to review this question for each area under their administration, it may be possible to specifically define "traditional activity" for each area. Accordingly, these regulations do not contain a definition of "traditional activity." If BLM determines a need to define "traditional activities" as it applies to ANILCA Section 1110(a) access in the future, the definition needs to be established in regulation prior to implementing restrictions, as was done by the National Park Service for the definition as it applied to snowmachine use in the Old Park of Denali (36 CFR 13.950). The Forest Service is the only other federal agency that has defined "traditional activities" to date, and that definition was intentionally inclusive: "Traditional activities include, but are not limited to, recreation activities such as fishing, hunting, boating, sightseeing, and hiking." (FSM 2300, Chapter 2320). **Section 811 "Qualified Rural Resident" and "Other Means of Surface Transportation"** The management prescription referenced in the previous section also allows "qualified rural residents" to obtain a permit to use motorized boats and other means of surface transportation traditionally employed for subsistence purposes as an exception to the seasonal closure of motorboats and airplanes. We understand BLM is attempting to define those users who will be eligible for a subsistence access permit; however, ANILCA Section 81 1(b) applies broadly to "local residents." The term "qualified rural residents" only applies to consumptive use of fish and wildlife managed by the federal subsistence program. Other subsistence uses, such as berry picking, firewood and vegetation gathering, are not limited to "qualified rural residents." Therefore this so called allowance is without basis and unenforceable. Furthermore, in order for the public to fully understand what this provision applies to, "other means of surface transportation traditionally employed" would also need to be defined. Similar to the discussion above on the definition of "traditional activities" if left undefined, BLM is inappropriately putting the burden of proof on the public. **ANILCA Section 810 Analysis** It appears that conclusions about proposed actions generally under-disclose potential effects to subsistence uses and needs. ANILCA does not state that effects to subsistence uses may not be allowed. Instead it requires the federal agency to analyze and disclose potential effects; and where they are expected to be significant, requires notice, hearing, and reasonable steps to minimize adverse impacts. Despite substantial proposed changes to current subsistence practices, including permit requirements for OHV use, motorized boating, and campsite occupancy, this analysis concludes that none of the proposed management actions or alternatives will have any impact on subsistence uses and needs. These actions will have impacts that need to be acknowledged. Below are some specific examples of unreported impacts.	

COMMENT #	COMMENT	BLM RESPONSE
	• Alt. 2, Wildlife: The analysis appropriately recognizes a permit requirement for certain OHV use as an "additional burden" but does not similarly characterize a permit requirement for motorized boat use. In both instances, the analysis concludes the proposed action "will not have an effect on subsistence uses and needs," which ignores the fact that the permit requirement, by itself, will have an impact on users that are accustomed to obtaining subsistence resources freely, without first having to obtain "permission" from BLM. • Alt. 2 and 4, Wildlife: Camping will be restricted to designated campsites in both alternatives and dispersed camping will be allowed when using "Leave No Trace" camping methods. Alternative 4 also establishes a mandatory camping permit system for the designated sites, but exempts subsistence users who camp away from designated sites. In all instances, the evaluation concludes that "allowing dispersed camping for subsistence users will not have an effect on subsistence uses and needs." While we recognize allowing disbursed camping has a positive effect on subsistence use, the analysis ignores the potential negative effects of being limited to specific campsites, use of possibly unfamiliar camping methods, and having to compete with recreational users over designated sites. • Alt. 4, Wildlife: Motorized boat engine size is limited and airboats and hovercrafts are prohibited, yet the Analysis states these limitations "do not pose an added burden to subsistence users" and"...will not have an effect on subsistence uses and needs." At a minimum, these statements need to be supported as to why they do not create a burden or affect subsistence uses and needs. Furthermore, it appears the analysis only addresses the potential impacts of proposed management prescriptions (i.e. Implementation Framework Decisions). It should also evaluate the Adaptive Management Actions, which include additional phased-in restrictions. We urge re-evaluation and full disclosure of the potential impacts of proposed management decisions to subsistence users, including the impact on access to subsistence resources. **Clarifying the State's Role regarding Fish and Wildlife Management** The Alaska Department of Fish and Game (ADF&G) is responsible for the sustainability of fish and wildlife in the State of Alaska, regardless of land ownership, and is the primary management authority for fish and wildlife. Consistent with ANILCA Section 1314, ADF&G's responsibilities include determining healthy populations and allocating fish and wildlife - including for subsistence purposes unless specifically preempted by federal law. All BLM lands are open for harvest under state general hunting regulations unless the area is closed by the Federal Subsistence Board to the non-federally eligible. The State of Alaska currently provides for caribou take in Game Management Unit 13. Narrative on pages 66, 70, and 77 imply that state regulations do not apply in the Delta Wild and Scenic River (DWSR) corridor. "The DWSR corridor is a federal subsistence hunting area...." We request acknowledgement of the State of Alaska's underlying authorities regarding fish and wildlife consistent with the Master Memorandum of Understanding between BLM and ADF&G (attached under separate cover).	
EA PROCESS		
21	A comparison table summarizing the differences between the four alternatives would have been a valuable tool to the reviewer. I recognize that the detail of the narrative cannot be shown in table form, but the main points outlined would allow for a quick comparison of the alternatives on the standard topics. Then the reviewer could go back into the narrative to find the detail they require.	A comparison table summarizing the differences between the four alternatives has been provided as an appendix to the EA.
23	After reading through the draft environmental assessment, I request that any future assessments contain a glossary or index of all the acronyms used in the report (at least 20+ in this document). In a document with 121 pages, it's difficult to quickly review the material when one has to go back and hunt for the initial discussion of a particular term (example, ORV vs. OHV). A foot note highlight on each acronym used should direct you to this glossary page.	An index of acronyms has been provided as an appendix to the EA.

COMMENT #	COMMENT	BLM RESPONSE
28	Suggestion for EA: Summary Charts for all Alternatives and Zones	Please see response to comment #21 in this section.
37	Your management plan seems complete in its general analysis, although a summary chart for all Alternatives and Zones would be helpful.	Please see response to comment #21 in this section.
53	In the introduction to the EA, the public is informed that "Decisions made in this [EA] planning process will be incorporated into a subsequent revision of the 1983 Delta Wild and Scenic (DWSR) Management Plan." In other words, two separate plans are in the works: a SRMA Plan and a proposed revision of the existing river management plan that will incorporate the proposed action/preferred alternative of the SRMA Plan. When the revised river management plan is to see the light of day is not disclosed, but given the 27 years that have passed since publication of the existing plan, the public may be in for another long wait before the Bureau proposes a revision of the outdated existing plan. Let us hope that this is not the case, and that a proposed revision will soon be available for public review. BLM's two-plans procedure is unnecessary, awkward, and confusing. BLM should simply issue a draft environmental impact statement for a revision of the 1983 plan. This would avoid the duplication and redundancy in producing two plans, reduce the Bureau's administrative and planning costs, relieve the public of the obligation to consider two related plans when one will suffice, and save time for all involved. Yet it is not too late for a streamlined and more efficient planning process. The draft EA analysis can be folded into a Draft EIS/Revised Delta WSR Management Plan that would also consider additional alternatives identified in scoping for the larger plan. We urge BLM to take this step. In the online and printed versions of the EA, it is difficult to readily compare the various features of each alternative and perhaps formulate a new alternative or a variation on an EA alternative that contains features from one or more of the EA alternatives. In the interest of a more user-friendly final EA, the final EA should include a side-by-side comparison of the four alternatives in the format found in most NEPA documents. Readers will expect the usual format in the forthcoming update of the river management plan.	The BLM believes that the LUP Amendment/SRMA Plan needed to be separate from the final river management plan revision to help maintain the focus on recreational decisions that were required to be analyzed in this SRMA planning effort. Goals, objectives, and management decisions for other resource values (in addition to recreation) were already made in the EARMP, and will be carried through to the final river management plan revision. This was done because these decisions have already been made and were outside the scope of this planning process. The revised river management plan will merely be a compilation of decisions made in this planning process and in the EARMP. A comparison table summarizing the differences between the four alternatives will be provided as an appendix to the EA.
55	It would be useful to have the total number of river miles by classification and within each zone. Specifically, it would be helpful to include those mileage numbers next to the acreage figures in Tables 1 and 2.	The BLM will update Tables 1, 2 and 3 with the total number of river miles by classification and within each zone.
56	**Lack of Compelling Issues** Compared to other land management plans in Alaska, the Delta plan contains a broad array of proposed public use restrictions, including seasonal motorboat and airplane restrictions; subsistence permits, restrictions on pack animals, biking, dog-mushing, chainsaws, discharge of weapons, and supply caching; camping group size limits, and temporal camping limits. Compared to other wild and scenic river corridors in Alaska, the number and degree of proposed public use restrictions for the Delta imply extensive public use, substantial user conflicts, and/or significant resource impacts. Yet, as the EA acknowledges, the Delta River corridor is characterized by "relatively low use areas" (page 58), "relatively stable use patterns" (page 59), "high quality of fish habitat" (page 51), and "traces of use are minimal"' (page 55). We agree there are few actual problems on the Delta River and, therefore, conclude that most of the proposed restrictions are either unnecessary or premature. We recognize Section 1.9 lists "issues," but these are included to gauge the effects of a proposed management decision on a resource. These "issues" do not appear to be typical resource concerns that would normally drive the development of proposed alternatives. For example, in Section 1.9.10 Travel Management, proposed management decisions appear to be creating issues rather than resolving them. Planning processes normally identify an issue; consider user experiences, benefits and conflicts; and then arrive at a proposed management decision. The public is generally more supportive of management decisions when there is a clear rationale for the proposed action. **Insufficient Justification** Related to the lack of issues is a corresponding lack of justification for the proposed management intent.	**Lack of Compelling Issues** The BLM believes that the proposed use restrictions that were developed are based on issues that are presently occurring within the watershed, or have a high potential to occur during the life of the plan. The Delta River is one of a few road accessible wild and scenic rivers in the state, and that comparing use levels on the Delta River to other rivers without the same level of road access is not a valid benchmark for future management of the Delta River. **Insufficient Justification** Justifications for the proposed restrictions are included in the EA in Chapter 3, Section 3.2.6.5 Recreation Management Concerns on pages 65-69. **Inappropriate Use of the Gulkana River Planning Outcomes Without an LAC Process** The results of the Gulkana River planning process were useful in determining the adaptability of the same types of management actions for the Delta River. Using the knowledge gained from the implementation of management actions developed in the Gulkana River planning process, in addition to the 2005 Delta River User Survey, the BLM attempted to create a similar methodology to

COMMENT #	COMMENT	BLM RESPONSE
	While the Draft EA and SRMA Plan have recreation as a focus, it is unclear how, within a Wild and Scenic River corridor, a planning process can be implemented without consideration for the resource values supporting the recreational experiences, activities and benefits. The plan does not make a clear connection between management prescriptions and the resource values upon which all use depends. It appears the public use restrictions are either BBM based (i.e., "Motorized boating and airplane landings will be seasonally restricted within the zone to help preserve the beneficial outcomes and setting character decisions") or something altogether undisclosed (e.g., no site specific resource concerns are provided to justify limits or prohibitions on camping group size, camping timeframe, chainsaws, vegetation cutting, recreational discharge of weapons, fireworks and supply caching). While the Affected Environment and Environmental Impacts chapters generally discuss potential impacts and benefits from proposed management actions on resources and user conflicts, no specifics are provided that demonstrate a need to limit public use, nor is it clear why such restrictions are imposed prior to using less restrictive management tools. Also, the over-reliance on recreation-based BBM is problematic for a plan that affects more than recreational use. See the ANILCA section below for additional concerns about justification in the context of ANILCA. **Inappropriate Use of the Gulkana River Planning Outcomes Without an LAC Process** Many of the management proposals as well as the standards and indicators included in the Delta Plan appear to be adopted, in large part, from the Gulkana River Management Plan. The Gulkana River Management Plan was developed through a comprehensive Limits of Acceptable Change (LAC) process specifically tailored to the Gulkana River and guided by intensive State and public involvement. The Delta River planning process did not include a similarly comprehensive LAC process. Without this rigorous process, the Delta Plan lacks a reasonable basis for the standards, and by extension, the management prescriptions to meet those standards. In addition, while public use limits (such as group size) may achieve BLM's desired outcomes, we first request consideration of less restrictive measures. Less restrictive means may accomplish the goals of the plan with less burden on the public. For example, better enforcement of existing rules regarding Leave-No-Trace and waste disposal may be just as effective as new rules and should be tried before imposing new limits on the public. Voluntary registration/orientation is another alternative, which could also supplement data gathering efforts. Information made available to the public during voluntary registration will assist those who want to avoid encountering other groups in the area. Educating visitors can have other major benefits. For example, knowledgeable and experienced larger groups can have far less impact than smaller groups unversed in outdoor etiquette or who may be unfamiliar with the area. We therefore urge BLM to revise the proposed implementation framework decisions to phase in proposed restrictions incrementally as adaptive management actions. **Multi-Layered Plan is Difficult to Synthesize and Understand** The plan contains too many independent layers; making it difficult for the public to understand how the proposed decision layers affect one another and how the Plan will ultimately affect future use. These layers include: • three wild and scenic river classifications • five proposed outstandingly remarkable values (ORVs) that correspond with the wild and scenic river classifications • five BBM recreation management zones (RMZs) • recreation opportunity spectrum (ROS) classifications that correspond with each of the five RMZs Next, the reader is tasked with tracking three action alternatives that include: • proposed management actions that vary in each of the five RMZs • proposed adaptive management actions that include up to four phases. At a minimum, this plan needs to include a comprehensive table that synthesizes and integrates all this information so that each alternative can be viewed and described as one consolidated layer in direct comparison to the other action alternatives. In addition, given the plan's limited, one paragraph narrative	address issues that are occurring within the Delta River corridor. The BLM agrees that some of the issues have not progressed to the level of the Gulkana River, but the BLM also believes that the methodology for the Gulkana River has worked well and that this approach would help in dealing with the same issues that are presently occurring, or have the potential to occur, on the Delta River. Virtually all of the adaptive management actions use less restrictive measures (including education) before implementing more restrictive measures, with education being the primary Phase 1 component before more restrictive measures are implemented. In the case of user capacity management, voluntary registration systems are prescribed before mandatory registration systems. Implementation framework decisions that do not use adaptive management were made to preserve the prescribed setting character conditions for each RMZ, in order to achieve the primary targeted outcomes (activities, experiences, and benefits). **Multi-Layered Plan is Difficult to Synthesize and Understand** The BLM believes that the LUP Amendment/SRMA Plan needed to be separate from the final river management plan revision to help maintain the focus on recreational decisions that were required to be analyzed in this SRMA planning effort. Goals, objectives, and management decisions for other resource values (in addition to recreation) were already made in the EARMP, and will be carried through to the final river management plan revision. This was done because these decisions have already been made and were outside the scope of this planning process. The revised river management plan will merely be a compilation of decisions made in this planning process and in the EARMP. A comparison table summarizing the differences between the four alternatives will be provided as an appendix to the EA. **Public Involvement and Difficulties Understanding the New Planning Process** BBM planning is based on the participation of stakeholders who are familiar with and have a vested interest in the planning area. BBM does not take the place of NEPA public involvement, but is used as a planning tool to help identify the RMZs and associated activities, experiences, and benefits. All of the BBM decisions were open to public scrutiny during the Draft EA public comment period. The BLM exceeded the requirements of NEPA for public involvement during this planning process. While marketing may increase overall use to some extent, the BLM is obligated to provide the general public with information about available recreational opportunities on public lands. However, the BLM does believe that the level and types of marketing can be tailored to each RMZ to convey the overall setting character prescription that is being targeted. In areas that are targeted for primitive and semi-primitive experiences where the concentrations of users is relatively low, the level of marketing

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	description of the no action alternative, the table also needs to include specifics on current management to provide a baseline for comparison purposes. **Public Involvement and Difficulties Understanding the New Planning Process** We have several concerns related to public involvement with this plan and the Benefits Based Management planning process in general. First, the initial outreach seems to have targeted select stakeholder groups to take advantage of BLM's national mandate to include BBM in the planning process. We question whether all potentially affected stakeholders were equally aware of the opportunity to participate, or if they were aware, did they understand the potential impact of not participating. We are concerned that BBM is a recreational planning tool affecting non-recreational uses as well and that the public was not adequately informed about how the BBM process would be used. These concerns are further exacerbated by the lack of public meetings on this draft plan that would not only help the public understand the various layers and proposed management prescriptions for the Delta specifically, but also help the public be fully informed on how this new planning process is implemented from beginning to end. In addition, the requirements for RMZs seem unnecessarily excessive. According to Appendix 7.1, the defining characteristics for an RMZ require that each zone take on a recreational identity of its own, each RMZ must have a different recreation setting character, serve a different recreation niche; and provide different opportunities, experiences and outcomes. Also, each RMZ requires a different set of recreation provider actions to align with "the strategically-targeted primary recreation market demand." By artificially forcing a different experience in each RMZ of an SRMA, the BBM process risks imposing excessive or unwarranted management prescriptions. Also, since the purpose of BBM is recreation management, concessions for subsistence and other uses protected by ANILCA must be made, which also trends toward unnecessarily burdening the public with more management prescriptions. Lastly, creating "marketing strategies" for each RMZ is unusual for land management planning; especially one that proposes public use limits, and thus appears counterintuitive. For example, in Tangle Lakes Zone 1, where motorboats and airplanes are seasonally prohibited (see Alternative 2 on page 18), the target audience for marketing is nonmotorized lake boaters. By increasing marketing for a specific zone, more people will visit that zone - potentially exacerbating user conflicts; while scaled back marketing efforts would more likely stabilize visitation and, hence, reduce user conflicts and impacts on the zone. (Also, motorboat restrictions in this zone appear unnecessary due to the natural barriers that already inhibit use of motorboats.) It seems pointless to encourage growth and simultaneously restrict use because of increasing impacts. Based on scoping comments from participants in the BBM working groups, this concept has already caught the attention of local residents concerned about marketing efforts to increase use.	and delivery methods would be commensurate with these targeted outcomes. In areas where the setting character prescription is for higher levels of use, marketing would be offered to a wider audience and through additional delivery methods.
NEPA ADEQUACY		
04	**1. The Scope of the Climate Change Analysis is Improper.** The draft EA inaccurately reviews climate change solely at the global scale for direct impacts from recreation decisions and activities. The review needs to be conducted, in reasonable detail, with an analysis of what the local contribution to climate change impacts are from the authorized activities. While the BLM's decisions on recreation may result in less than minor contributions of green house gases, and therefore have a limited impact to climate change, review at the global scale is not the only scale the BLM is required to review impacts. It is dangerous to set a precedent in the BLM's environmental assessments that climate change is only reviewed in this manner. It is likely that the specific recreation decisions made in this plan, under the preferred alternative, will also have a minor local direct contribution to climate change. However, Alaska and the northern latitudes are experiencing climate change at a much more rapid pace than the rest of the planet, justifying the requisite 'hard look'. We suggest that the analysis review the localized contribution to climate change and consider choosing language in the EA that states the contribution of recreation decisions for both local and global climate changes. In addition, we suggest you revise the following statements: Page 8 'Effects of recreation management decisions to contributing causes of climate change within the DWSR corridor' is an inaccurate interpretation of our scoping	**1. The Scope of the Climate Change Analysis is Improper.** It is beyond the scope of this planning process to relate the proposed management actions to specific quantities of greenhouse gas emissions. Language will be added to the EA on pages 93-94 stating both the local and global contributions of GHG emissions as a result of the proposed management actions, although these contributions cannot be quantitatively estimated with accuracy. **2. The Cumulative Impacts Analysis is Inadequate.** *A. The EA reviews impacts only through the lens of recreation management.* The cumulative impact analysis in Chapter 4.4.1 describes the anticipated impacts from the reasonably foreseeable planning assumptions discussed in Chapter 4. These planning

COMMENT #	COMMENT	BLM RESPONSE
	comments. The statement should be expanded to include cumulative impacts of recreation decisions and known/anticipated climate change impacts. Page 79 states that recreation activities 'would not themselves result in global warming and climate change'. Climate change in and of itself cannot be attributed to one emission or occurrence and is a cumulative impact resulting from amassed individually insignificant or small emissions that have collectively impacted our planet. **2. The Cumulative Impacts Analysis is Inadequate.** *A. The EA reviews impacts only through the lens of recreation management.* The EA inaccurately reviews the impacts to the river corridor solely through the lens of recreation management decisions. Cumulative impact analysis should be reviewed for the 'incremental effects of the alternatives when combined with past, present and future actions, regardless of what agency or person undertakes such actions.' EA at page 100. Impacts reviewed solely through the lens of impacts from recreation decisions to the area makes the EA inadequate for not meeting the requirements under 40 C.F.R. 1508.7 as it does not consider cumulative impacts to recreation and resources from actions both within and outside of the river corridor. While reasonably foreseeable actions are listed, there are no explicit or implied reviews for impacts from these actions. Please add additional discussion to the EA for impacts to the defined planning area - the Delta Wild and Scenic River corridor - for climate change, mineral development, recreation decisions, road corridors and other foreseeable impacts. B. *The EA fails to assess the cumulative impacts associated with climate change.* The BLM must include a cumulative impacts discussion in chapter '4.0 Environmental Impacts' in regards to the local scale of impacts from global climate change as well as how recreation decisions may increase or compound recognizable and predicted changes in the river corridor. This includes a discussion on impacts to the area soils, fish habitat, water quality, vegetation composition, wildlife, and recreation. The East Alaska Resource Management Plan (RMP) did not review the impacts of climate change within the planning area (with the exception of a cursory paragraph on climate change impacts to soils and vegetation). As a result the BLM has an obligation to include these reviews in the EA. An incomplete EIS does not allow for informed decision making. Animal Def. Council v. Hodel, 840 F.2d 1432,1439 (9th Cir. 1998). Under 40 C.F.R 1500.1(b), 'Procedures must insure that environmental information is available for public officials and citizens before decisions are made and before actions are taken. The information must be of high quality.' During discussions with the BLM's Glenallen Field Office, it was made clear that the East Alaska RMP amendment was limited in scope to recreation management and would not consider including an amendment that covered missing climate change reviews. If the BLM will not be including climate change impacts in the RMP to guide step down planning, the EA must review the cumulative impacts of climate change. Under NEPA § 1508.7 a '"cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions (Federal or non-Federal) or person undertakes such other actions.' The BLM must include these reasonably foreseeable impacts in the EA to most effectively apply adaptive management strategies. Whether or not the BLM has the ability to influence/limit the occurrence and severity of climate change, the obligation to recognize and mitigate cumulative impacts in the river corridor remains. An EA must make a good faith effort to 'study and identify' relevant problems and alternatives and establish either the insignificance or planned mitigation for environmental harms. Protect Key West, Inc. v. Cheney, 795 F. Supp.1552 (S.D. FLA 1992) *C. The EA fails to assess the cumulative impacts associated with mineral materials extraction.* Mineral materials extraction was described as permitted in the recreation portion of the Delta River corridor under the East Alaska RMP (page 436). There is no mention of this allowed use or review for impacts in the EA. An overview should be included on page 101 under '4.3.1 Cumulative Impact Area (CIA) and Reasonably Foreseeable Future Actions (RFFA)' There is no explicit, site specific discussion or even a mention of the allowed minerals material extraction allowed in the recreational portion of the Delta corridor. In the East Alaska RMP, on page 437, a simple statement that 'gravel extraction has little impact on recreation experiences but can negatively impact visual resources' does not replace the need for a more	assumptions do include minerals material extraction. *B. The EA fails to assess the cumulative impacts associated with climate change.* A cumulative impacts discussion has been added to Chapter 4 of the EA on page 120 for climate change. *C. The EA fails to assess the cumulative impacts associated with mineral materials extraction.* The BLM disagrees. Where applicable to each resource, the impacts associated with mineral materials extraction have been discussed in the cumulative impacts section. *D. The EA's cumulative impacts analysis fails to assess impacts for soils, wildlife, wilderness characteristics and air quality.* A cumulative impacts discussion has been added to Chapter 4.4 of the EA for soils, wildlife, and wilderness characteristics. There were no direct or indirect impacts to air quality; therefore there is no cumulative impacts discussion (BLM NEPA Handbook H-1790-1 page 57). **3. The EA Fails to Adequately Assess Mineral Withdrawals.** **4. The EA Fails to Adequately Assess Ongoing Mineral Exploration.** **5. The EA Fails to Adequately Address Predator Control Activities on BLM Lands.** **6. The EA Fails to Adequately Assess the Direct and Indirect Impacts of the Right-of-Way.** Mineral withdrawals, mineral exploration, predator control, and rights-of-way management are not within the scope of this planning effort. The planning criteria on Page 5 of the Draft EA states: "the plan amendment will only address recreation management and will supersede only those sections of the existing EARMP that relate to management of the Delta River SRMA. The plan will conform to all other decisions made in the EARMP". Page 4 also states: "New decisions that will be made as part of the Delta River SRMA Plan and EARMP Amendment will be analyzed in this EA. These decisions will apply to recreation management and only for BLM managed lands within the DWSR corridor and Delta River SRMA. Recreational decisions made in this plan will be incorporated into a subsequent revision of the 1983 DWSR Management Plan. Decisions made in the EARMP for other resources within the planning area will not be changed and will also be incorporated into the revised DWSR Management Plan".

COMMENT #	COMMENT	BLM RESPONSE
	site specific review, nor does it honor NEPA for public participation when it is not mentioned in the EA. It is unreasonable to assume that the public has reviewed the RMP, in preparation for commenting on the EA. If the BLM wishes to tier to the RMP EIS for any analyses conducted in that EIS, it must explicitly state that it is doing so, so the reader can review that analysis. Omitting the discussion does not allow for 'informed decision making and informed public participation.' Idaho Conservation League v. Mumma, 956 F.2d 1508, 1519 (9th Circuit) Please include a description of the mineral materials extraction that can be expected in the Delta River and review for impacts in the direct, indirect, and cumulative cases. *D. The EA's cumulative impacts analysis fails to assess impacts for soils, wildlife, wilderness characteristics and air quality.* The EA outlines reviews for cumulative impacts under section 4.3.2 Cumulative Impacts Analysis and lists: cultural resources, fisheries, recreation resources, scenic resources, travel management, vegetation, and water quality. It is an oversight to not include soils, wildlife, wilderness characteristics and air quality in the cumulative impacts analysis. Mineral activities on adjacent lands, climate change, and recreation management can disrupt and alter the existing nature of the area and the designations of the river corridor. Without a good faith effort at reviewing future impacts, the management direction outlined in the EA will not allow managers to sufficiently anticipate impacts, nor respond as necessary, with adaptive management. **3. The EA Fails to Adequately Assess Mineral Withdrawals.** The EA presents no discussion of mineral withdrawals, the new 16,000 acre withdrawals prescribed for the river in the RMP, or the prohibition of mineral development. There is no mention of the worth of withdrawals in the EA for protecting recreation and resource values. Please include a discussion of ANCSA and other administrative withdrawals in the EA. On page 26 of the Record of Decision for the East Alaska RMP the BLM recommended a new mineral withdrawal for the 16,000 acres of land along the scenic portion of the Delta River. There is no mention of this withdrawal proposal, alternative management for the remaining scenic acreage not covered by the 16,000 acre withdrawal, or the existing Alaska Native Claims Settlement Act (ANCSA) 17 (d)(1) withdrawals that are in place. There is no mention of the withdrawals in place throughout the corridor or the role they play in management of the Delta River corridor. **4. The EA Fails to Adequately Assess Ongoing Mineral Exploration.** The ongoing exploration permitted for the MAN project adjacent to the Delta River corridor and its impacts to recreation and user enjoyment need to be reviewed in the following sections as prescribed: Section 4.3.2 Cumulative Impacts Analysis should be updated to analyze the impacts of continued and expanded exploration; Section 4.3.2.4 Scenic Resources should be updated to discuss the sound impacts from drilling and helicopter flights and the Visual Resource Management impacts from drill platforms and drill operations in the viewshed of the Delta River; Section 4.3.2.2 Fisheries and Section 4.3.2.7 Water Quality should include a discussion of the impacts to fisheries and water quality within the Delta WSRC from potential seepage of water from unlined overflow pits associated with exploratory drilling; and Sections should be added in the Cumulative Impacts Analysis section (Section 4.3.2) to analyze the identified cumulative impacts to soils, wildlife, wilderness characteristics and air quality (see comment 2.D. above)and these added sections should discuss the impacts from exploration activities. On page 100-101, the EA discusses mineral exploration and mine development adjacent to the Delta WSRC. The description of this activity and its impact is focused almost entirely on the future development of a large-scale mining operation. However, in December 2009, Nevada Star Resource Corporation applied to the Alaska Department of Natural Resources for a five year exploration permit for 2010-2015, indicating its intent to continue to explore the area for mineral reserves. In the permit application, the company indicated that it will drill 52 drill holes in two claim blocks and from the maps submitted with the permit application, some drill holes will be within sight and sound of the Delta WSRC. See AMPA #F109742 p. 21. Drilling will occur 24 hours a day, 7 days a week, roughly from June 1st until September 15th. The application also indicates that equipment and employees will be moved between drill holes by helicopter. Given the pending application before the Alaska Department of Natural Resources, the continued and expanded exploration	

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	of the area is a reasonably foreseeable future action, the cumulative effects of which should be considered in the EA in detail. Please update the description of mineral development discussion on pages 100-101 to include information about the pending application and proposed drill holes and methods. **5. The EA Fails to Adequately Address Predator Control Activities on BLM Lands.** Any predator control activities on BLM lands should be reviewed in the EA or a subsequent assessment. The impact of predator control was not reviewed in the East Alaska RMP so must be done here or prohibited until there is a time that an assessment can be done. Environmental reviews are conducted for state managed predator control activities on US Fish and Wildlife Service Lands as well as National Park Service lands, both under the Department of Interior. It is reasonable to believe that a consistent application of reviews for predator control should also be required for BLM lands. Impacts (both beneficial and detrimental) of predator control on biodiversity, wildlife viewing for recreation, and system productivity should be reviewed before management activities are allowed to proceed. **6. The EA Fails to Adequately Assess the Direct and Indirect Impacts of the Right-of-Way.** The BLM has inaccurately listed the anticipated right-of-way through the river corridor and potential bridge and powerline construction as a cumulative impact to the Delta River. This should be reviewed for the direct and indirect impacts from potential road construction on the river instead of simply listing as a potential cumulative impact of mineral operations on adjacent lands with no real analysis. Further, the BLM merely listed the likelihood of development with no actual reviews for impacts in the Cumulative Impacts Analysis. The BLM has confused direct impacts with cumulative impacts: a road corridor or bridge in the WSR is not a cumulative impact and should be discussed as a potential direct impact during the life of the plan. While there certainly may be cumulative impacts associated with mineral development on adjacent lands and with any road proposal but the BLM must review reasonably foreseeable actions for their direct, indirect and cumulative impacts. If an 'impact is sufficiently likely to occur that a person of ordinary prudence would take it into account in reaching a decision' then it must be reviewed in the EA. Friends of Magurrewock v U.S. Army Corps of Engineers, 498 F.Supp.2d 365,374-75 (D. Me.2007)	
10	Ignoring for these purposes the adequacy otherwise of the DEA's cumulative impacts assessment, we believe BLM's definition is not correct. Cumulative impacts do not result just from individually "minor" (p. 100) impacts, though cumulative impacts can result from individually minor ones. They can also result, and consequently can be even more substantial, from individually moderate or major impacts.	The Council for Environmental Quality defines cumulative effects as " the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions" (BLM NEPA Handbook H-1790-1). This change will be reflected in the EA on page 120.
42	this should be an eis not an ea. this plan should fous on protection not on "recreation". earth is rapidly being developed into concrete sites.it is important to protect, not recreate. there are plenty of places for recreation. We dont need more. we need more protection. our kids deserve protection, but this agency has completely forgotten saving anything at all for them. this area should be saved as wilderness, complete wilderness. Blm approaches are horrific -they stem from bush/cheney - the haters of the environment. the guys who want to blow it all up. obama seems to not be aware yet of how horrific blm is. this agency needs to be reined in. its actions are completely focused on greed and money.	The Environmental Assessment is used as a means to determine if there will be any significant issues that require the preparation of an Environmental Impact Statement. We have not yet made this determination. That will be done once a Finding of No Significant Impact (FONSI) is prepared with the release of the EA.
56	The Plan is short on information about the future of mining in and adjacent to the planning area. Nevada Star Resource Corporation (U.S.)/Pure Nickel, Inc. holds 2,315 state mining claims encompassing 164,600 acres (257 sq. mi.) and 525 federal mining claims encompassing 10,500 acres (16+ sq. mi.). Mineral exploration has been conducted on these claims for the past five years. Access to federal mining claims is governed by the Utility Corridor Resource Management Plan and regulations in 43 CFR 3809. Mine operators are entitled access to their operations consistent with the mining laws. This plan cannot alter access to valid mining operations. Nevada Star/Pure Nickel is planning another exploration program on their claims in 2010. Nevada Star/Pure Nickel acquired many of the claims from American Copper and Nickel Company, Inc. and located many more themselves. The mining claims are situated between the	Revisions will be included in the EA in Section Chapter 4.2.3 regarding the future of mining operations that are adjacent to the river corridor. Furthermore, a large scale mining operation has not been currently proposed, and the mining companies that operate adjacent to the river corridor estimate that this will not occur during the life of this plan (see comment #43 in editorial changes section). Given this information, BLM does not believe that a comparison between motorized activities in RMZ 1 and potential mining disturbances is required.

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	Maclaren River on the west and the Richardson Highway on the east, and they straddle both sides of the DWSR corridor. The Nevada Star/Pure Nickel website currently indicates nickel-copper-platinum group metals of 15.4% Ni, 7.19% Cu, and 170 grams/ton PGM + Au and Ag over widespread areas on their mining claims. Most of the recent exploration has been located in the Amphitheater Mountains on either side of the DWSR corridor. Previous exploration was focused in the Fish Lake and Broxon Gulch areas. Under the Alaska Statehood Act, (PL 85-508), these mineral lands bordered by the Maclaren River (west), Richardson Highway (east) and Denali Highway (south) were selected by the state for their base metal mineral potential. If a mine were ever developed in the areas indicated above, it would likely be an underground mine with road access from the Denali Highway to the south. However, large mining operations could occur in numerous areas bordering the WSR. Drilling analysis from the west and east sides of Zone 4 offers evidence of rich mineral deposits trending toward a mineral resource band stretching through Zone 4 and the Delta River. Any future large mining operations and mining facilities would likely have some visual and soundscape impacts to the Delta River WSRA near the Tangle Lakes and Zones 2 and 3. A large mining operation will involve considerable tractor-trailer traffic through the corridor along the Denali Highway and excavating machines and blasting will be audible in areas managed to preserve natural sounds and solitude. In light of future large mining operations in the area, the impacts of summer motorized boating and airplane landings would be negligible in comparison. Therefore, the restrictions on motorized activities in Zone 1 would be ineffective in preserving the desired outcomes. In conclusion, we request more analysis about projected and potential mining activities in the region before making final decisions.	
PUBLIC INVOLVEMENT		
23	The BLM staff writing the DWSR draft environmental assessment has done a thorough job. They appear to have factored in many diverse user groups with careful consideration for the physical environment and the plants and animal contained therein. I'm sure they have had many meetings collaborating between the staff to come up with the five different zones, each with four different alternatives. Hopefully people will comment on their hard work. I've talked to a few Tangle Lakes users who would like to comment, but don't feel they have the time to assimilate the 121 pages and write a meaningful response. A six week comment period may seem a long time in the eyes of the BLM, but for the general public the time frame is short. It doesn't leave a lot of time to collaborate among different people. If the common quote, "time is money", is applied in this Environmental Assessment and comment period, BLM employees have gotten paid to write the plan, but those who have to write comments must in essence take their time (in other words money) to submit their comments. If you allowed more time for comments, additional comments may come forth. Extending the comment period through the fall would give people the chance to actually visit the site and look for boundaries between the different zones, assess trails they may never have used, and contemplate various aspects of each alternative in discussions with other users. A longer comment period would be appreciated, as the people who actually routinely utilize the area should provide their expertise and opinions to you, the policy makers. I'm supportive and have respect for the BLM staff and appreciate their efforts. Thank you for considering these comments. I sense there may be a significant majority of Tangle Lake users who would like to comment but haven't.	The BLM met or exceeded the requirements of NEPA for public involvement during this planning process. Please see comment #55 in this section for additional information.
39	Benefits Based Management is a good start but it neglects the key component to any process. Folks need to have good discussions after the initial EA is published. Preliminary scoping is necessary and good---it brings forth lots of ideas and allows all groups to set forth their individual concerns. However, no one group or individual can think of everything, so it is necessary to have all comments melded into a draft document------and then allow for meetings and comments. PAC likes a regulatory process that allows for public hearings on the draft. We are opposed to planning based regulations.	The BLM met or exceeded the requirements of NEPA for public involvement during this planning process. Please see comment #55 in this section for additional information.
55	We appreciate the previous efforts by the Bureau of Land Management to involve the public in the planning	The BLM met or exceeded the requirements of NEPA for public

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	process for the Delta River Special Recreation Management Area (SRMA). The scoping phase of plan development is an important component in the planning process, particularly for one as relatively new and esoteric as Benefits Based Management (BBM) Planning. We understand that a series of focus group meetings on the BBM were held in Spring 2007 during preparation of the East Alaska Resource Management Plan/ Environmental Impact Statement. However, while the BLM made an outreach effort through a mailing list and via its website, no public meetings, open houses or workshops were held during the 60 day scoping period in 2008. The scoping report notes that at least one organization submitted comments critical of the lack of opportunities for public participation during the scoping process. The report further notes that only 20 scoping comments were received. Given that 3 years have passed since the 2007 BBM focus group meetings and nearly 2 years since the scoping period, the Commission is disappointed that the BLM initially provided only a 30 day public comment period for review of this EA and draft management plan. Even more disappointing is the fact that no public meetings or open houses were held. Public meetings would have given the BLM the opportunity to explain the plan and its alternatives and to answer questions from the public. Preliminary scoping and planning meetings are useful and necessary to provide the public with information and for gathering input from user groups. However, experience has demonstrated that the public provides more meaningful input and feedback when responding to specific management or regulatory proposals. The general public is also more inclined to give testimony or make comments at a public meeting than to submit written comments. We understand that this plan attempts to accommodate, in some magnitude, all of the user groups identified during the focus group phase of the process. The intentions of the plan seem good. However, we have concerns regarding the overall complexity of the plan and how that may decrease the public's ability to understand and be involved and informed about management decisions. We are especially concerned with the lack of public input opportunities because this is a new planning methodology with outcomes measured and defined based on very subjective parameters. If BBM is to be the standard approach for future management decisions, the BLM must go beyond current minimum requirements for public involvement. At the same time equal consideration and representation must be given to each of the different user groups throughout the process. While it is impossible to represent every opinion of a good or bad experience, this would expand the range of considerations and increase perceived credibility in a subjective process. We do note that BLM did meet with a group in the Paxson area to discuss the EA and plan amendment and eventually agreed to extend the comment period for an additional two weeks. While we appreciate the short extension, a 45 day comment period with no public meetings is inadequate for this or any management plan. Before finalizing either the river plan or the RMP amendment, we strongly recommend that the EA be revised and expanded and an additional public comment period be provided. Additionally a series of public meetings should be held in the affected area, as well as in Anchorage and Fairbanks. Although we do not believe that there is sufficient justification for such actions, selection of any plan alternative that involves closures or restrictions to ANILCA 1110(a) access requires the BLM to publish proposed regulations, provide opportunity for public comment and hold public hearings as required by law and the regulations at 43 CFR Part 36 before closures or restrictions can be implemented. Even where not specifically required, we would encourage similar public meetings and opportunity for public comment for any public use limits or restrictions made under other BLM authorities.	involvement during this planning process. A Notice of Intent to initiate the planning process was published in the Federal Register on April 10, 2008. Scoping comments were accepted for 60 days, beginning July 15, 2008 and ending on September 15, 2008 (NEPA only requires a 30 day scoping period). A total of twenty comments were received during the scoping period. After analysis of these comments, a scoping report and comments table were prepared and were available on the Delta River planning website. The BLM also provided a 45 public comment period on the Draft EA (NEPA only requires a 30 day public comment period). Letters detailing both the scoping period and the availability of the Draft EA were sent to more than 1,300 parties on the Glennallen Field Office contact list, and were posted on the BLM website and publicized through local venues including the Copper River Record, Delta Wind, Anchorage Daily News, Fairbanks News Miner, and the statewide "What's Up" list serve. Public service announcements aired over KCHU, KDHS and KCAM.
NEW ALTERNATIVES PRESENTED		
14	I suggest alternative #4 with these comments: All motorized vehicles should be limited to 35hp instead of 65hp and jetskis, hovercraft and airboats shouldn't be allowed in any zone. They are very noisy and disturb the solitude of the Wild and Scenic River corridor. For future reference, it should say no motorized craft in Tangle Lakes between the wayside and the campground. There is a lot of waterfowl in this area that would be disturbed if that should happen.	Currently, Alternative 4 would prohibit the use of jetskis, hovercraft and airboats within RMZ's 1, 2, 4, and 5. Alternative 4 would also prohibit all recreational motorized boating in RMZs 1 and 4. The BLM will modify Alternative 4 to include a prohibition on all motorized watercraft use in RMZ 3 (Tangle River between the wayside and campground) and to limit motorized boating to 15 horsepower motors within RMZs 1 and 2, which would include

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		Round Tangle Lake. The BLM believes that the 65 horsepower limitation for RMZ 5 is appropriate to ensure that users have enough power to safely negotiate the braided Delta River floodplain, and that recreational motorized boating is consistent with the targeted semiprimitive motorized recreational experience for RMZ 5.
21	The BLM currently has a recommendation of a 15 horsepower limitation, page 72. There must be some basis for this recommendation for it to be in place yet the BLM evaluates only a 65 horsepower limitation in their conservation alternative, alternative 4. I personally feel that, with regards to horsepower, there is an insufficient range of alternatives presented. When 37% of motorized users support a 15 horsepower limitation below Round Tangle Lake (page 73) it seems unreasonable not to include that as an alternative that is evaluated. Personally, I think that a limitation of 65 horsepower is unacceptable. 57% of the motorized boats on the Tangle Lakes were less than 15 horsepower, page 72, in the Delta River User Survey. That fact, in and of itself, justifies the BLM at least considering the current 15 horsepower recommendation in Alternative 4. Impacts of larger horsepower motors include large wakes that erode the banks, cause sedimentation and vegetation damage (discussed on page 53 under fisheries concerns related to recreational activities). Not to mention the noise that high horsepower or jet boat puts into the air. By limiting horsepower, the BLM could address several resources issues with one regulation while improving the recreational experience for the majority of users of the area (those pursuing a non motorized experience and those motorized users who recognize the appropriateness of a smaller horsepower engine for the setting and established use of the area). There are very few places where the BLM would be able to put forth horsepower limitation due to the navigability of the waterways they manage. With the water column deemed as non-navigable (as shown on plan maps due to lack of navigability denotation) and therefore not owned by the State of Alaska, this is a rare opportunity for the BLM to provide a recreational experience, smaller motorized craft, that is not present in surrounding areas or waters. I recommend and support a change in the BLM's preferred alternative to include a horsepower limitation in Zone 2 for all the reasons stated above. My preferred horsepower limitation would be at 15. This horsepower limitation is, personally, one of the most important issues that this plan can address. Aside from large scale impacts from mining, I think that the more common place large horsepower motorized boats are on the Tangle Lakes the more the current recreation setting will change.	Please see response to comment #14 in this section.
28	As you have implied, the No Action alternative would be a poor choice. There are just too many people using the area. Alternative 2 is the most motorized, least restrictive, too "laissez-faire," and would not work either for the same reason. Alternative 3 is more restrictive, but would not work either because it allows too much motorized use and group sizes that are too large. Especially in Zones 1, 2, 4 and 5, it does not respect the desire for solitude and peace and quiet. Although flawed, Alternative 4 is my preferred alternative. It is the most restrictive of motorized use and group size and, with its other provisions, is more respectful of my personal desire for solitude and peace and quiet when I am in the area. Alternative 4 could be improved by: 1. Not allowing any motorized travel in Zones 1, 4 and 5 above Eureka Creek at any time of the year. 2. A group size of 6 would be better than 8. Remember, 6 people could equal 6 canoes. 3. The boundary for Zone 4 should be moved down to Eureka Creek, which is the end of the clear water. 4. No weapons should be discharged until after freeze-up anywhere in the corridor. 5. There should be a 1000 pound limit on ORV's wherever they might be permitted throughout the area, that is, use of only the smaller four-wheelers. 6. Chainsaw use should not be permitted anywhere in the corridor. 7. All unauthorized motorized trails should be shut down. 8. Use of ORV's on the Top of the World/Yost motorized trails should be by permit only.	Thank you for your comment. Please see response to comment #14 in this section.

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37	Alternative 4 could be improved by further reducing the size of groups and size of zones where motorized travel is permitted.	Thank you for your comment. Please see response to comment #14 in this section.
53	Pending the opportunity to consider alternatives in the forthcoming revised river management plan, we suggest some changes to EA Alternative 4 that would provide additional protection for the remarkably outstanding values of this National Interest lake-river system. Of the three action alternatives, Alternative 4 comes closest to achieving the level of security required for the Delta WSR. **1. Motorboat horsepower limits.** In Alternative 4, Tangle Lakes Zone 1 would allow up to 35 hp motors, 65 hp in Tangle Lakes Zone 2, and 65 hp in River Zones 4 and 5. A 35 hp limit on the lakes conflicts with BLM's "current recommended limit" of 15 hp on the lakes. We recommend that BLM revise Alternative 4 to include its preferred 15 hp limit on the lakes and speed limits designed to avoid shoreline erosion and conflicts with non-motorized users. For the clear water section of the river from the portage area to Eureka Creek, and from Eureka Creek to Mile 212, the 65 hp limit of Alternative 4 is excessive. BLM needs to determine what horsepower and boat size limits are consistent with avoiding damage to instream and shoreline habitat caused by wakes and turbulence from high-speed V-hull jet boats and other powerful motorboats. This is especially important for the clear water section that is essential habitat for the world-class Arctic grayling fishery. Although "BLM acknowledges the State of Alaska's authority to manage between the ordinary high water marks" in the navigable stretch of the wild segment, the State's land is within the boundaries of the Delta WSR. As an inholding, the State land and the use of the river itself is subject to reasonable BLM regulation designed to protect the unit's remarkably outstanding values. Horsepower and speed limits in the navigable stretch should be part of the alternative selected for the final EA. **2. Off-Highway Vehicle (OHVs) use for subsistence activities.** Sec. 811(a) of ANILCA allows for the "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." The EA allows OHVs for subsistence purposes, apparently on the assumption that OHVs were traditionally employed for these purposes prior to designation of the DWSR in 1980. However, before OHVs can be allowed or prohibited for subsistence purposes, BLM must first undertake a formal traditional use determination. Apparently, no such determination was made, as the EA is silent on this matter. In any event, the final EA should include a BLM traditional use determination. If OHVs are found to have not been traditionally employed for subsistence purposes prior to ANILCA, OHVs cannot now be permitted for such purposes. If on the other hand OHVs are found to have been traditionally employed, and thus are permitted, the "reasonable regulation" requirement suggests that the gross vehicle weight should be a maximum of 1500 pounds, not the EA's 2000 pounds. In other national conservation system units, and on state lands, 1500 pounds is the standard. **3. OHV use for "traditional activities."** Sec. 1110 (a) of ANILCA authorizes the use of snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods for traditional activities and for travel to and from villages and homesites (emphasis added). The section further states that "Nothing in this section shall be construed as prohibiting the use of other methods of transportation for such travel and activities on conservation system lands where such use is permitted by this Act or other law." "This Act" (ANILCA) does not authorize the use of motorized surface transportation methods, in this case OHVs, in conservation system units. And as the EA notes, BLM policy on wild segments of wild and scenic rivers, a policy based on the Wild and Scenic Rivers Act, is that "Motorized travel on land and water could be permitted, but it is generally not compatible with this river classification. Normally, motorized use will be prohibited in a wild river area." We recommend that BLM revise Alternative 4 to prohibit the use of OHVs for traditional activities in the Delta WSR. This would involve closing the Top of the World/Yost Trail and the Rainy Creek Trail to traditional-use OHVs. As documented in the EA, OHV use of the TOTW/Yost Trail has resulted in extensive erosion on the hillsides adjacent to the Delta River where the trail crosses the river in the clear water section, home	**1. Motorboat horsepower limits.** Please see response to comment #14 in this section. **2. Off-Highway Vehicle (OHVs) use for subsistence activities.** The BLM believes a traditional use determination is not necessary since OHV use has been historically documented within the DWSR corridor prior to WSR designation and continues to occur for subsistence harvest of moose and caribou within RMZ 5. All other RMZs prohibit OHV use during the snow free months under Tangle Lakes Archeological District use restrictions. GVW restrictions of 2000 lbs. are consistent with other BLM plans in the Anchorage District, which include the Glennallen Field Office planning area. **3. OHV use for "traditional activities."** The BLM agrees that ANILCA Section 1110 does not preserve OHV use as a traditional access method, and this language has been removed from Alternatives 2 and 4 in the EA for RMZ 5. The BLM also believes that recreational OHV use on designated trails in RMZ 5 can be managed in a way that protects vegetative and soil resources. Requirements to stay on designated trails and a GVW limitation of 2000 pounds, in addition to continued trail maintenance, allows for sustainable OHV use on these designated trails. At this point in time, the BLM does not agree that the current impacts from OHV use warrant a closure to recreational or subsistence OHV use on the Top of the World Trail, although the BLM would reserve the right to close the trail to these uses in the future if impacts are causing undue degradation of the resources. Private and commercial user capacity management frameworks are included as adaptive management actions for Alternatives 2, 3 and 4. These actions specify a social encounter rate standard as a method of determining maximum carry capacities, with voluntary registration and/or permit systems prescribed, based on these social encounter rates.

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	to the world-class Arctic grayling fishery. Damage to water quality, fishery habitat and the river's banks is also likely occurring. If OHVs are found to have been traditionally employed by local residents for subsistence purposes prior to ANILCA, the Rainy Creek Trail could remain open to subsistence OHVs, but the TOTW/Yost Trail should be closed pursuant to the reasonable regulation requirement. Rainy Creek Trail provides access to the same general area west of the river that the TOTW/Yost Trail enters. A fifth alternative for a permit system for travel on the river segments would be a valuable addition to the EA. It is clear from the EA's descriptions of existing use and overuse along these segments that a permit system is a reasonable and feasible alternative under the terms of NEPA. It is not clear what the BLM thinks is the optimum carrying capacity of this lake-river system. In preparation for the forthcoming revised river management plan, BLM should research what the optimum carrying capacities are for the wild and scenic segments of the river and offer alternatives consistent with these capacities. Alternative 4 should be amended to eliminate the provision calling for no signs alerting river users to the presence of the falls and the take-out at mile 212. Public safety takes precedence in this case, and in any event the presence of the signs does not significantly detract from the wild river setting. Similarly, the portage outhouse should remain in place pending the likely eventual requirement for portable toilets. In alternative 4, all recreational motorized boating will be prohibited in semiprimitive nonmotorized Tangle Lakes Zone 1, and in primitive Delta River Zone 4, except that in both zones qualified local residents can use motorized boats for subsistence purposes, and all other persons can do the same for traditional activities. In addition to all residents of Delta Junction, the final EA should include the number and residency of other local residents who qualify for subsistence use of motorized boats. A definition of "traditional activities" is also needed.	
57	Of the alternatives considered I would advocate for adoption of Alternative 4. The primitive and semi-primitive recreation opportunities along the DWSR are its greatest asset, and fairly unique for an area with such accessibility to the road system. Strictly limiting motorized access is essential for preserving these qualities. Ten individuals camping in a single campsite in a primitive or semi-primitive area is too many in one place, it is unlikely that a group that large could leave the area in a condition that would not be obviously impacted. This would detract from the experience of those that encountered such a large camp during occupation, or came upon the site for possibly several weeks afterward. For the same reasons, limiting the amount of trail improvements, markings, and signage is also desirable.	Thank you for your support of Alternative 4.
EDITORIAL CHANGES		
02	4.3.1 Cumulative Impact Area and RFFA. Ongoing exploration of the roughly 280 square mile area of largely state lands includes the MAN project. This work is being conducted by Pure Nickel Inc. (http://www.purenickel.com/s/Home.asp) rather than the Nevada Star Resource Corporation which merged with Pure Nickel in 2006.	Thank you for the clarification. This change will be reflected in the EA in Chapter 4.2.3
27	Page 17, last box—Add clean campsites, portages, lake and river shorelines to visitor services.	Visitor services referenced under the administrative setting character conditions refer to the general level of visitor interactions between the BLM and the public that will occur in each RMZ. Cleanup of portages, campsites, and shorelines is covered in detail under the adaptive management actions associated with each alternative.
43	Pure Nickel's comments on the Draft Environmental Assessment (Draft EA) are restricted to the first bulleted paragraph under Section 4.3.1 Cumulative Impact Area (CIA) and Reasonably Foreseeable Future Actions (RFFA). This section addresses mineral exploration in the area. Our comments are as follows: The description of "intense" exploration is somewhat misleading. One or two drills operating seasonally over a 3-month period in a 280-square mile area cannot really be accurately described as being intense. The exploration project is being carried on by Pure Nickel on the mineral claims formerly held by	Thank you for the clarification. Your suggested revisions will be included in the EA in Chapter 4.2.3.

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	Nevada Star Resources Corp. (U.S.). Pure Nickel acquired Nevada Star in 2006. The comparison with the Pogo Mine is probably reasonable. However, we wish to register the following points: Order-of-magnitude disturbance cited in the paragraph is an over-estimate of the actual disturbance. The most recent Pogo Reclamation Plan (Draft 2008) indicates that the mine area itself is permitted to disturb 425 acres, and by 2008 had disturbed only 386 acres. The road to the Pogo Mine includes another disturbance of 491acres for a 40-mile (approximately) single-lane road. It is difficult to imagine a requirement for a road of that length in the Pure Nickel project area. The power line for the Pogo Mine includes another 651 acres, but the overwhelming majority of the powerline disturbance does not disturb the vegetative mat. That is, the "disturbance" involves clearing the trees that might grow into the line. It does not involve clearing the smaller shrubs and bushes on the tundra. This equates to essentially no disturbance in the Denali Highway area where no large trees exist. Thus, a more accurate description of the Pogo-related disturbance would be that it includes disturbance of approximately 490 acres at the mine site, plus a one-lane road and a power line. A lengthy power line would not be a necessity if a mine were to be developed on Pure Nickel's claims. The Alaska pipeline crosses Pure Nickel's claims and, just north of the claim boundary, a diesel cracking plant could be constructed at the existing pumping station. The potential exists to produce power practically on site, should a mine ever be developed on the Pure Nickel property. As to any future mine development, it is useful to indicate that the minimum time between identifying a large ore body and development is over a decade. Thus, even if the drilling makes a significant find this year (2010), it will be a minimum of 10 - 15 years before development would occur – assuming a mine is economically and environmentally feasible. It is quite likely that the time frame would be even longer. Finally, it is probably useful to indicate that it is quite likely, given the large area being explored, that development of a mine could occur in a manner that does not cross the WSR corridor nor is even visible from the corridor, and any mine development would occur after a multi-year, public permitting process. Given the information above, we recommend that the following points be included in revisions to the paragraph: 1. Pure Nickel's exploration project is focused on finding nickel and platinum group elements. 2. The exploration is occurring in areas north of the Denali Highway. In some locations, the exploration is occurring near the DWSR corridor. 3. Geologic information indicates that the area has a high potential for a significant discovery of platinum group elements which are strategic metals required to control carbon emissions and combat global warming. 4. Pure Nickel is exploring for the metals within a 280-square mile area that includes both sides of the WSR. The area includes both State and Federal mineral claims. The State completed two comprehensive land-use plans for the area. Both plans kept the area open for mining, and future large-scale mining is possible. If exploration leads to the discovery of an economically viable deposit, the deposit will likely to be developed only through underground mining (not open-pit) techniques. If so, a mine could be developed in a similar manner as the Pogo Mine (about 38 miles northeast of Delta Junction). 6. Surface disturbance will vary depending on mine design, construction of roads, power line corridors, selection of tailing disposal method, and other factors. The Pogo Mine has a permitted disturbance of 425 acres plus a 40-mile road to the site. Road building, airstrips, and associated material sites account for the largest surface disturbance followed by mine, mill, tailings disposal site, and camp facilities. While most of these disturbances would occur on State lands adjacent to the DWSR corridor, it is possible that some road construction or power lines could place possible demands for access or right-of-way authorizations across the river corridor. 7. It is also possible, given the size of the exploration area, that any such development would occur without crossing or even being visible from the corridor. 8. Finally, the minimum time between identifying a viable ore body and development is over a decade. Thus, even if the drilling makes a significant find in 2010, it will be a minimum of 10 - 15 years before development would occur –assuming a mine is economically and environmentally feasible. It is quite likely	

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	that the time frame would be longer.	
55	**Definition of Semiprimitive Nonmotorized** In the Environmental Assessment, the semiprimitive nonmotorized resource opportunity spectrum to be managed for is defined as: Area is characterized by a high degree of naturalness. Concentration of users is low to moderate, but solitude is still possible. Area is free of motorized roads and trails, but some motorized boating use is present, limited by physical terrain features. Vegetation and soils are predominantly natural, but some impacts exist at campsites. Management presence is subtle and limited, absent of any facilities. This definition implies that areas classified for this type of experience are open to motorized boating except where the physical terrain features are limited, yet later parts of the document indicate otherwise. In alternative 2, Recreation Management Zone 1 is classified as semiprimitive nonmotorized. Under the Outcomes to be Avoided section, an activity to be avoided is "motorized boating during June and July". Also, in the Implementation Framework Decisions section, under Travel Management, the document states "[d]uring June and July motorized boating and airplane landings will be prohibited." The definition is not consistent with the rules for this alternative and zone and could be confusing to the user. Please clarify the definition. Justification for this seasonal closure should also be included in this section of the document. **Delta River Recreation User Survey and Visitor Usage Interpretations** Parts of the Environmental Assessment (EA) use the Delta River Recreation User Survey and visitor usage numbers as supporting evidence for identified issues and ultimately to justify the imposed limitations and restrictions (i.e. 3.2.6.5.7, 4.2.5.1, 4.2.6.2, 4.2.6.4). Although the methods and analysis used in the river survey appear to be of high quality, we find some of the management decisions derived from that information in the EA to be stretching beyond the limit of extrapolation. Basically, we do not agree that the need for proposed restrictions and separation of user groups can be justified with this data. In section 3.2.6.4 of the EA, Visitor Use Trends, a chart depicts historical visitor use data from different segments of the wild and scenic river corridor. The chart lists the number of reported annual visits by year and by river segment. The table shows relatively stable usage through the years with numbers essentially the same or less than those from 20 years earlier. While the summary explains that some of the earlier data collection methods were thought to overestimate actual numbers, the data from the past ten years shows the same trend where use is stable and in some cases decreased. Under section 3.2.6.5.1 Group Sizes (page 60) it reads: Regardless of the fluctuation in estimated visitor use figures since 1983, there is evidence of an increase in both state population and out-of-state visitation over the past two decades. Most importantly, some of the data shows that on some segments of the river, current use levels are causing unacceptable change to the experience of the user and impacting the natural and primitive character of the river (refer to Figure 2). Figure two shows that the mean reported largest group size was 7.8 while the mean largest tolerable group size was 8.1. Further, the median reported group size was 5 and the median largest tolerable group size was 7. This data suggests that group size has not exceeded the tolerable level and 50% of the time, the largest group observed was five people. Based on the polarity of the groups targeted in this survey (non-motorized user and motorized users), this is the type of result that would be expected when two generally opposing viewpoints are represented. Also, these statistics do not indicate unacceptable change in the natural and primitive character of the river and cannot be said to indicate change of experience unless there is a similar survey against which these data may be compared. The visitor use trends (section 3.2.6.4) would indicate that use levels have not changed since 1983, but essentially have remained the same. On page 62, results from the river user survey are also discussed. The survey asked for actual encounters (the number of contacts with other groups per day), preferred encounters, and tolerable encounters. The discussion states that "[f]or the lake segments, reported encounters were higher than preferred encounters. For the river segments reported encounters were nearly equal to preferred encounters, indicating that encounters on the river segments are approaching a point that is not desirable." If tolerable encounters were less than reported encounters, one could infer that this number is approaching a point that is not desirable, but not based on the preferred and reported	**Definition of Semiprimitive Nonmotorized** Under the BBM management framework, prescribed setting character is developed using the ROS classification system as a guide. It is the goal of the BLM to manage this area under a semiprimitive nonmotorized ROS classification. Even though there is the potential for motorized boating access within RMZ1, the BLM will still seek to manage the area for a semiprimitive nonmotorized recreational experience by focusing marketing and educational efforts towards nonmotorized recreational opportunities. The BLM believes it is important to note that a limited amount of motorized boating may occur within the management zone, but due to physical terrain features limiting this access, would not preclude the area from being managed for the attributes associated with a semiprimitive nonmotorized experience. **Delta River Recreation User Survey and Visitor Usage Interpretations** Regarding Section 3.2.6.4, the BLM recognizes that use trends appear to be stable and that visitor use numbers are difficult to estimate in open systems such as the DWSR corridor. Notwithstanding visitor use estimations, the BLM does believe that current use levels may be causing changes to recreational experiences and impacting the natural and primitive character of the river. An editorial error refers the reader to Table 2, rather than Table 5 on Page 63. Table 5 shows that a majority of respondents (both motorized and nonmotorized) would prefer a more primitive setting than the current available setting on some sections of the river. Data in this table supports the statement that "current use levels are causing changes to recreational experiences and impacting the natural and primitive character of the river". This editorial change will be made in the EA on page 63. Alternatives were developed with group size limitations that exceed both the median and mean reported and tolerable results from the 2005 survey. Alternative 2 proposes a group size limitation of ten, Alternative 3 is twelve, and Alternative 4 is eight. The proposed groups size limitations were not developed based solely on the 2005 river survey, but on a number of factors including campsite impact thresholds, social encounter considerations, and riparian/vegetative resource concerns. It is the goal of the BLM to manage encounter levels in a way that they do not approach, or eventually exceed, tolerable encounters. Table 5 on page 63 shows that preferred encounters have already been exceeded on the lake segments, and that preferred encounters equal the reported encounters on the river segments. The BLM believes that management is needed to prevent encounter levels from approaching or exceeding the

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	categories. One might presume that the preferred encounters would always be less than the reported encounters, no matter how satisfied people are. The conclusions listed in the River User Survey (page 33) do not suggest that encounters on the river are approaching a point that is not desirable. On page 57 of the Environmental Assessment (in reference to the River User Survey), it states that "[motorized and non-motorized users] rated being with friends and family very important, but the least important attribute among both groups was meeting other river users, which suggests that while friend and family groups are acceptable, minimizing interaction and competition between other user groups is desired." In the survey, users are asked to rate a list of reasons for taking a trip as not important, somewhat important, important, very important or extremely important (Delta Wild and Scenic River User Survey, page 88). Because users rated "meeting other river users" as "not important" this does not infer that interactions with others are undesirable, it could also mean that it was simply not a priority or the reason for the trip. Please also consider these types of excerpts from the River User Survey in the analysis: For all respondents taken together (Table 11), no segment is "over capacity," and only the Lower Tangle Lakes are in the "high normal" category. In general, both the Delta and Tangle Lakes are generally un-crowded resources, and crowding scores are well below those of nearby rivers such as the Gulkana and several Susitna Basin rivers. The Upper and Lower Delta River segments have particularly low crowding ratings, suggesting they offer relatively unique low density opportunities. [Page 27] Analysis of crowding ratings by years revealed no pattern of higher scores in more recent years. However, there were some patterns among crowding ratings for various segments by month (Figure 9). In general, lake segments are higher during the subsistence hunting seasons in August and September, although the Lower Tangles also sees relatively high ratings in July. River segments remain low through the entire recreation season, but Lower Delta ratings are slightly higher in hunting season. Results are consistent with anecdotal information about how hunters use the lakes and lower river by setting up long term camps and traveling via powerboats in search of game, which might lead to slightly higher crowding scores. [Page 30] Majorities of all groups indicated that the Delta / Tangles had stayed the same or improved, with slightly higher percentages for motorized and lake users. However, 44% of non-motorized and 45% of river users reported some decline (although most reported a slight decline). It is difficult to assess whether a perceived decline is related to actual changes in conditions or a general human response that "things aren't like they used to be." If memories of negative conditions fade sooner than memories of positive ones, it may be difficult for any recent trip to compare to previous ones. Nonetheless, impacts may have increased in recent years, and these data may reflect some of those changes. [Emphasis added] [Page 39] Figure 36 indicates that the highest use levels in the system occur at Tangle Lakes Campground and Tangle Lakes Wayside interpretive site. Lower boat launch use, in contrast, suggests fewer visitors to the corridor take boats on the water; of those that do, more use is associated with the Upper Tangles launch (where all upper lake trips start and finish) than the Lower Tangles launch (perhaps because "through trips" put-in here but take-out elsewhere). For all four facilities, there is no trend over time; data instead suggest year-to-year variation that is probably due to factors such as weather, fires in the area, flow levels, etc. [Emphasis added] [Page 82] The EA utilizes the River User survey to support the need for complex management, but parts of the survey could be interpreted to suggest that increased management and imposed restrictions are not necessary for the current level of usage. It appears that river users were divided on whether some form of management change is needed, which could be attributed to the selection of the survey group and their representative opposing worldviews. While other, more frequently used rivers may benefit from the type of management proposed in this EA, more compelling evidence is needed to suggest necessity here. The information provided does not suggest a strong desire from the public for complex management and usage restrictions on the Delta River.	tolerable level, since they have already surpassed or are at the preferred level, and that this constitutes responsible management of carrying capacity and social encounters. Regardless of why "meeting other river users" was rated by a majority of both motorized and nonmotorized users as the least important reason for taking trips on the DWSR, the management of group size and social encounters will help to limit the occurrence of "meeting other river users". Given that this was the least important reason for taking trips among both motorized and nonmotorized users, the BLM believes that this is a valid management goal that can be controlled through group size limitations and social encounter management. The BLM agrees that the Delta and Tangle Lakes are generally uncrowded resources and crowding scores are well below those of nearby rivers such as the Gulkana and several Susitna Basin rivers....and that...the Upper and Lower Delta River segments have particularly low crowding ratings, suggesting they offer relatively unique low density opportunities. This is why the BLM believes that it is necessary to implement management actions that will keep the DWSR an uncrowded resource with relatively unique low density opportunities. The BLM believes that without these types of management actions, the DWSR may have the potential to become crowded in the future, as discussed in our earlier comment regarding Table 5 on Page 63. Table 5 shows that a majority of respondents (both motorized and nonmotorized) would prefer a more primitive setting than the current, available setting on some sections of the river. Even though some parts of the survey could be interpreted to suggest that increased management and imposed restrictions are not necessary for the current level of usage, it is the position of the BLM to be proactive in the recreational management of the river corridor, rather than responding to issues once they have already occurred. The BLM believes that the proposed management actions will help to preserve the river in its immediate, natural environment, and will also provide tools to recognize changes over time within the river corridor.
56	Page 6, last paragraph: This paragraph cites moose harvest figures from 1990 to 2009. We presume this information is provided because subsistence users rely on OHVs to retrieve meat from the harvest of these large animals. If so, we recommend such an explanation. If OHVs are also commonly used to retrieve caribou meat, we recommend addressing caribou as well.	The BLM acknowledges the State's responsibility in the conservation of fish and wildlife resources in the State of Alaska. References in the text to a federal subsistence hunting area does not preclude these responsibilities of the State, but rather,

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	Page 92,4.2.9.1: Federal subsistence uses of fish and wildlife are not "protected" as implied by the first sentence of this section. Subsistence use of fish and wildlife are a "priority opportunity" amongst other consumptive uses and Congress, in Section 801(4), found it necessary to invoke constitutional authority to "... protect and provide the opportunity for continued subsistence uses...." (Emphasis added) Subsistence use of fish and wildlife can be closed "... in order to protect the continued viability of such populations, or to continue such use...." We request acknowledgement that the federal subsistence priority is a "priority opportunity" and any Congressional protection applies only to the opportunity to harvest, not actual harvest. Page 101, 4.3.2.2 Fisheries: The following description of potential disturbance to fisheries excerpted from the EA is more fitting for placer mining operations than a large hard rock mining operation. "Future activities associated with mineral development may have adverse effects on drainage patterns, water quality, and riparian vegetation, although this would depend upon the location and area of activity. Disturbance and displacement due to mineral development could be long term. The removal of streamside riparian-wetland vegetation during mining would result in a loss or degradation of aquatic ... " There may be an undocumented cumulative impact from hard rock mining in the future; however, most federal and state permits issued for mining operations include stipulations to protect or mitigate damage to the environment. The final decision needs to take this into consideration. Page 103, 4.3.2.7 Water Quality: The documents cited in the paragraph below, and in several other places in the EA, are not listed in the bibliography. "Future development activities associated with mineral development would likely have adverse effects on drainage patterns and water quality, although this would depend upon the location and area of activity. Areas adjacent to the DWSR corridor that are disturbed due to mineral development could have long term impacts to water quality in the DWSR corridor. Depending on the level of disturbance, it could take decades to centuries before the structure and function of the original aquatic habitat could be reestablished (NCSU 1998; BLM and Montana Dept. of Environ. Quality 1996; BLM 1988)." Examples of mines in Alaska where the water quality and aquatic habitat have been improved during and after mining operations include Red Dog and Fort Knox mines. This discussion is overly biased. The final decision should recognize that mining permits would include measures to avoid, minimize, or mitigate adverse affects due to mining activity.	highlights the availability of such areas where federally-qualified rural residents may take subsistence resources using a federal subsistence permit. Draft EA Page 6, last paragraph:. Information on caribou harvests are now included. Draft EA Page 92,4.2.9.1: The BLM agrees that federal subsistence priority is a priority opportunity to harvest subsistence resources in times when resources may be limited such that the harvest of said limited resources necessitates closure of other harvest opportunities by non-federally-qualified subsistence users. Draft Ea Page 101, 4.3.2.2 Fisheries: Thank you for the clarification. Placer mining will be specified under water quality impacts. This change will be reflected in the EA on pages 113-115. The documents used to explain the cumulative effects associated with mineral development for water quality have been added to the bibliography and include: North Carolina State University. 1998. Successful Mitigation. Internet website at http://h20sparc.wq.ncsu.edu/info/wetlands Raleigh, NC: North Carolina State University Cooperative Extension Service, Department of Biological and Agricultural Engineering. U.S. Department of the Interior, Lewiston, MT Bureau of Land Management and Montana Dept. of Environmental Quality. 1996. Final environmental impact statement, Zortman and Landusky Mines; Reclamation Plan Modifications and Mine Life Extensions. Document No. BLM/MT/PL-96/005+1990.
NAVIGABILITY		
21	On many of the maps there is a depiction of a section of river that is “navigable,” Zone 5 up to mile 212. I could not find a discussion of the navigability of the Delta system anywhere in the text outside of the one sentence on page 32. Has a navigability determination already been made on the Delta system or is this the document where that is taking place? Am I to infer that the BLM is maintaining water ownership for the majority of the Delta River and Tangle Lakes? I would be in support of this mainly because it would allow the BLM to have greater control over the enforcement of horsepower limitations on those sections of the Delta. What is the process for making a navigability determination? It would be helpful to have that included as an appendix to this plan since it has such far reaching management implications at the practical level.	Please refer to page 2 of the EA for a discussion regarding the navigability determination that was prepared by the BLM for the DWSR corridor. The navigability determination is available upon request from the Glennallen Field Office.

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38	The State of Alaska has long ago determined that the Delta River is a navigable waterway. We all know that the State of Alaska regulates these. How does BLM make the determination that the river is only navigable up to the Garrett Creek confluence? Where is the line on what the state says is navigable? Who has the final say? In your over flight and river checks you have seen motor boats above the Garret Creek. This is stated by you guys in this environmental assessment draft. Why are you taking away a good amount of river from the motor boating enthusiast? The river generally dictates how far upstream a power boat can go. We know that on a good high water year boats will only be able to make it to the lagoon as we sometimes call it, which is still downstream of the falls. By limiting the boats to a certain amount of river, you are essentially "stacking" the motor boats on top of each other. This not only provides a negative and possibly unsafe situation for the motor boaters but can all so be an eyesore for the non-motor users. I'm sure that they would not like to see all the motor heads stacked up through one section of the river when they can be spaced out. Being a multi use river, it makes more sense to me to have both user groups share as much of the river as possible.	Navigability is not dependant on whether or not a motorized watercraft can be operated on a particular river. The Federal test for navigability relies on whether or not a river was used for travel, trade, and commerce at the time of statehood. The BLM navigability determination determined that it was not above Garrett Creek, therefore nonnavigable in this portion of the river corridor. This determination was completed independently from this planning process. The boundaries between RMZs were developed to provide a range of recreational opportunities, including primitive and semiprimitive nonmotorized experiences, based on the prevailing uses and the potential of these areas to offer the prescribed setting characteristics. The mere fact that motors can be used in this area does not necessarily mean that the prescribed setting character should include motorized use. The boundary between RMZs 4 and 5 was developed to provide a primitive, nonmotorized opportunity in RMZ 4. Documented motorboat use within RMZ 4 is very low; consequently this allows the BLM to manage for a primitive nonmotorized experience in this area.
39	PAC disagrees with BLM's determination of navigability. The criteria in the Gulkana River court decision should be followed. (able to float 1000 lbs.) Also, commerce does not just involve the mining industry. Market hunters used the Tangle Lakes area in years past and sport guides have used the Tangle Lakes/Delta River for at least sixty years. The State of Alaska Department of Natural Resources should manage the waterway, consistent with the definition of Navigability that is presently being used.	The Federal test for navigability relies on whether or not a river was used for travel, trade, and commerce at the time of statehood. The BLM navigability determination determined that it was not above Garrett Creek, therefore nonnavigable in this portion of the river corridor. This determination was completed independently from this planning process. If the navigability of the DWSR is brought into question in the future through quiet action title proceedings, the BLM would amend this plan accordingly.
55	According to the EA, the BLM completed a navigability determination in February 2010. More information regarding this determination should be included in the final plan. Specifically, we would like to see details on why the State was not consulted more closely or involved in this determination. The final plan should also discuss the changes in management strategies that would occur should the State find it necessary to assert its ownership through a quiet title action. Section 3.2.2.1 indicates that archeological surveys from 07-08 "hint at the importance of the region for past subsistence and long distance travel". If new evidence is available to suggest the river was used for travel, trade and commerce, what was the basis for determining non-navigability? Would a new evaluation occur if new or additional information becomes available? Please include this information in the final Environmental Assessment.	Please see response to comment #39 in this section.
56	**Flawed Navigability Determination** The State determined that the Delta River is navigable in fact from its confluence with the Tanana through Lower Tangle Lake (Navigability Report- Delta River, June 1994). We do not agree with BLM's recent navigability determination that the Delta River, with the exception of the stretch between Garrett Creek to Phelan Creek, is non-navigable. The State will assert its ownership by an action to quiet title, if necessary. If subsequent decisions indicate this is a state-owned waterway, then BLM will not be able to implement some provisions of this plan, for example, the boat launch limits in phase IV as presented on page 38. **Management of Public Trust Resources** Without adequate justification, the State cannot support, nor would we implement, the proposed limits to public access to state resources (water) due to our responsibilities under the Public Trust Doctrine. Public	Please see response to comment #39 in this section.

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	use of natural resources, including the waters of the state, is protected in Article 8 of the Alaska State Constitution and in current statutes and regulations. Current public uses occurring on the Delta and Tangle Rivers and the Tangle Lakes are consistent with state statutes and regulations. Any impacts associated with such use on these waterbodies, at this time, are negligible and insignificant.	
OUTSTANDINGLY REMARKABLE VALUES		
10	Scenic resources are one of the major attractions of the Delta/Tangles area. Although scenic resources are sometimes described as subjective, it certainly seems that the vast majority of both Alaskans and visitors believe our state, including of course this area, is exceptionally beautiful and deserves strong protection. The DEA recognizes this important value in many places. "Scenic qualities were recognized as exemplary in 1983, and a quarter of a century later, still remain one of the most important resource values in the river corridor. Scenic quality is an essential component of most recreation activities" P.65 (see also, e.g., protecting the Class 1 viewshed, p. 6; scenic resources as an ORV, pp. 11-12). And one of the major impacts to scenic beauty is ATV trails, especially the large number of them that end up being extensively braided and wide (see, e.g., pp.65-66). As noted earlier, hiking trails should be constructed in ways that have low visual impact.	The BLM agrees. Thank you for your comment.
21	Page 12, ORV Fisheries, 5th management objective and Page 11, ORV Recreation, 4th management objective. Does the BLM have water rights for the Delta to achieve these objectives with regards to instream flow? With the mining potential in the area (discussed on pages 100-101 and in the cumulative impacts section on page 102) I would encourage the BLM to ensure they have the water rights needed. Page 12, ORV Scenic, 1st management objective. I support this objective and hope that the BLM uses this ORV to comment on and mitigate, to the extent within their jurisdiction, the potential impacts associated with a large scale nickel mine on State land that is a possibility in the area (described on pages 100-101). At the same time, I understand that the BLM has no management over lands outside the river corridor. Page 13, ORV Wildlife, 3rd management objective. I would hope that the BLM would use this ORV to comment on and mitigate, to the extent within their jurisdiction, the potential impacts associated with a large scale nickel mine on State land that is a possibility in the area (described on pages 100-101). I do not believe that the proposed scale and type of mining can occur on State lands without having adverse affects on the migration and wintering of the Nelchina Caribou.	The BLM is actively pursuing water rights for the DWSR. The application for water rights takes approximately ten years of water hydrology data collection, which is an ongoing process at this time. Once the data is collected, an application will be submitted to obtain water rights for the DWSR. Thank you for your support of the scenic and wildlife ORV management objectives. If large scale mining development does occur on adjacent state lands in the future, the BLM will likely be a major contributor in assessing the potential effects to all of the ORVs as a result of such an authorization.
27	To me ORV still means Off Road Vehicles. The phrase "Outstandingly Remarkable Values" seems redundant. It would be better to use "outstanding values" or "remarkable values" thus eliminating the confusion with the long used ORV acronym for Off Road Vehicles. Add Fisheries to Scenic Segment values.	The term "Outstandingly Remarkable Values" is used in Section 1b of the Wild and Scenic Rivers Act and at least one ORV is required for a river to be included in the WSR system. In abbreviating off road vehicles, the acronym "ORV" is no longer used by the Federal government, having been replaced by off highway vehicle, or "OHV". The density of arctic grayling in the scenic segment did not meet the criteria for inclusion as an outstandingly remarkable value in the scenic segment.
56	As acknowledged in the plan, outstandingly remarkable values (ORV) were not identified for any of the wild and scenic rivers designated by ANILCA and the current effort to identify ORVs for the Delta is conducted based on BLM guidance for evaluating a river's eligibility as a wild and scenic river. Since this process is usually done before designation, we reiterate our scoping comment that BLM should look primarily to legislative history for guidance on determining specific ORVs, which identified scenic, cultural and recreational values. We agree that these three values qualify as "outstandingly remarkable;" however, we question the necessity for the two additional ORV's: Fisheries and Wildlife. While the grayling fishery and the area's diverse wildlife are certainly important resources, they are not "rare, unique or exemplary" by	In cooperation with the State of Alaska, the BLM did look to the ANILCA legislative history in trying to determine the ORVs. There was no definitive legislation that specifically named the ORVs at the time of WSR designation. There were references to cultural, recreational, and scenic values, but specific ORVs were never named. Upon further inspection of the initial studies that were originally conducted to determine WSR eligibility and suitability for the Delta River ("Delta River: A Wild and Scenic River Analysis",

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	Alaska standards and we request they be removed.	Bureau of Outdoor Recreation, March 1976. "Draft Environmental Statement: Proposed Designation of the Delta River As an Element of the National Wild and Scenic Rivers System, Heritage Conservation and Recreation Service, 1978. "Delta River: A Wild and Scenic River Analysis", Heritage Conservation and Recreation Service, February 1978) the BLM found numerous references to "outstanding values" that included scenic, fish, wildlife, recreational, archeological, and geologic values. These discrepancies led the BLM to use the guidance provided by the Wild and Scenic River Coordinating Council as described on page 11 of the EA. The Fisheries ORV was evaluated, and partly due in fact, to the State of Alaska, Department of Fish and Game's own study, where results of a recent Delta River Arctic grayling study in this area showed one of the greatest densities ever recorded for a population of Arctic grayling ≥ 270 mm length in the world (Gryska, in preparation). We believe that this is a river-related value that is rare, unique and exemplary in a regional or national context, which are the criteria for an ORV. We believe that wildlife in the scenic segment meet the criteria for an ORV due to the annual migration of the Nelchina caribou herd directly through the river corridor and the density of trumpeter swans (a BLM sensitive species) that breed and nest in the lakes of the Upper Tangles. This display of breeding, nesting, and annual migration patterns owe themselves to the existence of the river corridor, also one of the criteria for an ORV.
GENERAL COMMENTS		
03	A comprehensive soundscape plan would probably require more resources than BLM has available for such a task in this area at this time. Even so, at least a scaled-back soundscape plan should be undertaken in order to obtain baseline data and to start planning for maintaining and restoring natural quiet and natural sounds in the area.	The development of a soundscape plan is not within the scope of this planning process, although this would not preclude the future consideration of a soundscape plan, dependent on staffing levels and funding.
04	The EA is missing a discussion on enforcement and implementation for the measures that are defined for the corridor. Recreation management decisions and mitigation measures in the plan can provide for the sustainable management of the river corridor. However, there is no explicit discussion about the enforcement of these measures and management for impacts from OHVs and mining. In addition to this, the monitoring and adaptive management described in the draft EA is only in reference to impacts from recreation decisions and does not cover climate change, mining, roads, and rights-of-way. Further, if the agency is using any mitigation or enforcement as described in the RMP it should site those measures in the EA for public review. There is no discussion of the cooperative management of the navigable portion of the Delta River between Garrett Creek and Phelan Creek. The BLM will be cooperatively managing the navigable portion of the Delta River with the State of Alaska. If there are inconsistencies in management designations or impacts from State management to the river corridor, the impacts should be reviewed in the EA for public awareness and to create an honest and clear picture of management challenges on the designated river corridor.	The BLM disagrees. Alternatives 2, 3 and 4 each contain administrative implementation decisions that discuss the implementation and enforcement actions to address restrictions on travel management (including OHVs), group size, occupancy, chainsaw use and firewood gathering, recreational shooting, fireworks, and disposal of human waste. Adaptive management decisions have also been structured to show implementation actions, monitoring, and enforcement for the management of litter, human waste, firerings, private and commercial user capacity, and campsite impacts. Chapter 4 discusses direct, indirect, and cumulative impacts as a result of OHV management proposals for each alternative. For example, the effects to archeological sites, fisheries, and wildlife caused by OHV use for each alternative were discussed in Chapter 4 of the Draft EA on pages 94-96 (cultural resources), pages 96-98 (fisheries), and pages 115-116 (wildlife).

COMMENT #	COMMENT	BLM RESPONSE
		Management actions were developed only for recreation decisions because decisions for the implementation and enforcement of climate change, mining, roads, and right of ways were already made in the EARMP and are outside the scope of this planning process. Page 4 of the Draft EA: "New decisions that will be made as part of the Delta River SRMA Plan and EARMP Amendment will be analyzed in this EA. These decisions will apply to recreation management and only for BLM managed lands within the DWSR corridor and Delta River SRMA. Recreational decisions made in this plan will be incorporated into a subsequent revision of the 1983 DWSR Management Plan. Decisions made in the EARMP for other resources within the planning area will not be changed and will also be incorporated into the revised DWSR Management Plan". Also, page 5 of the Draft EA, Section 1.6 Scope of the Analysis and Planning Criteria: "the plan amendment will only address recreation management and will supersede only those sections of the existing EARMP that relate to management of the Delta River SRMA. The plan will conform to all other decisions made in the EARMP". Cooperative management of the navigable portion of the river corridor with the State of Alaska would require the preparation of a Memorandum of Understanding (MOU) between the BLM and the State of Alaska, or the preparation of a Special Use Land Designation (SULD) by the State of Alaska. At this point in time, the State of Alaska disagrees with the navigability determination and has stated that they will not be developing a SULD for this portion of the river corridor.
10	We were pleased to see that Wilderness Characteristics is one of the issues identified in the EA. We would of course be even more pleased if BLM were to study portions of the lands they manage for inclusion in the national wilderness system. Probably the vast majority of the state's tourism operators use the "w" word in their marketing materials, and there's a reason for that. Alaska still has true wilderness (though motorized vehicle use degrades it), and many other places in the country no longer do.	The BLM agrees. Thank you for your comment.
15	At problem areas we need to better way to address key issue problems. For instance at Glacier lake trail at mile post 30 on the Denali HWY. The main trail goes through a bottomless swamp that is dangerous to hikers as well as OHV. These known problems cause all users to leave the trail and destroy the surrounding vegetation and disturb the archaeological sites. These trails need to be repaired or changed and not put in a file for somebody to review in 20 years for a change to possibly happen, meanwhile everybody points fingers at different user groups as to who's fault it is and nothing is done.	The Glacier Lake Trail is managed by the State of Alaska, Department of Natural Resources. This trail is not located within the planning area and is outside the scope of this planning process.
19	I have frequented the Tangle Lake-Delta River area for over thirty years. It is a crown jewel area in the Alaska Range, featuring great fishing, birding, wildlife viewing, boating, hiking, and wonderful wilderness. I support steps to protect and preserve it. I oppose roads, development, or proposed uses that detract from those qualities. I have not studied all proposed uses and don't mean to discount any thoughtful efforts undertaken to strike some balance among competing users. Having said as much, I do nonetheless wish to have my voice added to those speaking passionately in support of underscoring the wilderness and natural qualities of this area. It will not be the same experience if the mark of development stamps down upon it.	Thank you for your comment. The BLM believes that the range of alternatives presented include a variety of management options that seek to preserve the river and its immediate environment for future generations.

COMMENT #	COMMENT	BLM RESPONSE
31	In addition I hope you resist efforts to pave the Denali Highway past Tangle Lakes. This is one of the best drives in Alaska and should be enjoyed at a very slow speed not at 65 mph.	The Denali Highway is a State Highway maintained by the Alaska Department of Transportation and Public Facilities. The decision of whether or not to pave the Denali Highway is ultimately a State decision.
33	I've looked at the EA (and have few comments). Looks pretty good to me.	Thank you for your comment.
52	Please put the needs of Alaskans who use the referenced area for gathering of foodstocks for personal consumptive use at the top of any priority list for use of the lands. With regard to access of the lands, make further governmental restriction and prohibition for these users off limits. Make clear distinction between recreational use of the lands, to which prohibitions and restrictions may apply, and personal consumptive use, to which they must not. Make a valid state resident hunting or fishing license the only qualification for inclusion in the personal consumptive use category.	The BLM provides for the opportunity to harvest subsistence resources on federal lands. However, State hunting regulations also apply to hunting on federal lands. Therefore, both hunters hunting under State regulations and those federally-qualified subsistence hunters can harvest subsistence resources on federal lands. In times of scarcity of subsistence resources, federally-qualified subsistence users have priority opportunity to harvest subsistence resources on federal lands. In order to be a federally-qualified subsistence user, one has to be a rural Alaska resident and have a State of Alaska resident hunting license unless they are a minor.
54	I would like to have the BLM keep the same policy that has been and is being implemented today. Nothing needs to change for this area. We all seem to be getting along quite well with the rules that are in effect. This is all we need is more confusing rules on where and what we can do. I have always enjoyed this country because the BLM has been with governing the land. A lot of us who are local use this country throughout the year and not only for a few days out of the year, so why does it need to change for a few who think that it belongs to them. This is the last nice chunk of land we can use without all of the regulations stopping us from enjoying ourselves. We really don't need anymore rules.	The No Action Alternative (Alternative 1) would retain the same management strategy outlined in the 1983 Delta River Management Plan. The BLM believes that this management strategy does not effectively address the issues that have developed in the river corridor since 1983, and that it does not proactively plan for anticipated use levels and visitor trends in the future.
58	I am completely against development in and around the Upper Delta River corridor. It is one of the most accessible beautiful areas in Alaska and is heavily used by recreationalists, including some hunters. I am against the use of ORVs, drill rigs, choppers, and all the destruction associated with mining and development. Please prevent development in this area!	The range of alternatives was developed to provide for a variety of management options. Alternative 4 would prescribe the least amount of new facility development and the most restrictive management proposals for OHV use. Mining that occurs on adjacent state lands and the related use of drill rigs and choppers are outside the scope of this planning effort.
63	Please consider hunting & fishing -both sport and subsistence and recreation rafting when you pick your preferred alternative.	The range of alternatives presented includes a variety of setting character decisions that will help to facilitate fishing, hunting, and recreational rafting opportunities.
64	Please do not give permission or support for the damage of Alaska's wild wetlands. This includes military training and development. We only need to look at the oil spill taking place in the Gulf of Mexico to know how critically important it is to make these decisions with the precautionary principle guiding the result. Once the damage is done we humans do not have the capacity to recover these critical waters/lands.	Any military training or development that would be proposed within the DWSR corridor would require the proper land use authorization and/or special recreation permit, with stipulations that would ensure the protection of river resources.