

COMMENTS RECEIVED DURING DELTA RIVER MANAGEMENT PLAN SCOPING PROCESS

Comment Number	Commentor	Comment	Response	Action Taken
1	Ted Gschwind Private Citizen	<p>Thanks. As always my (our) family's concerns with all Alaska's land are; preservation of Alaska's beautiful out doors while still utilizing the access to not only explore the land we love by a trail system which will also acts as breaks and corridors to fight the ever present danger of wild fire. My wife and I and my children, born and raised here, are now sharing the state's wonders with their children. Hunting and fishing have always been important to all of us. Keep up the good work.</p>	<p>Alternatives developed in the Delta River Management Plan will consider access related issues and concerns.</p>	<p>No change to scoping issues or planning criteria.</p>
2	Ron Burris Private Citizen	<p>Thank you for the opportunity to comment on the Delta River Management Plan. This is clearly one of the most beautiful and unique areas in all of Alaska which has maintained its uniqueness and beauty in large part because it is just far enough from Anchorage and Fairbanks to keep it from being over-run like most other areas. BLM in my opinion has done an excellent job of keeping this area in its original and rustic state. The following are my thoughts and suggestions:</p> <p>The campground is probably the best in the State because of its rustic nature where you actually feel like you are in the back country as opposed to putting up a tent on a gravel pad next to a paved road. Please do not change that!</p> <p>The restrooms are the best maintained in the state and the people who maintain them should be complimented.</p> <p>On the 4th of July I saw for the first time jet skis on the lake. Jet skis and water skiing should be banned as they are not in keeping with the Wild and Scenic concept.</p> <p>It's hard to believe that BLM did not step in and purchase the property occupied by the Tangle Lakes Lodge. The danger of this turning into the incredible eyesore at Summit Lake is frightening and certainly would subtract from the Wild and Scenic concept in a big way.</p> <p>The mining activity of the past years including constant helicopter traffic subtracts in a major way from the wilderness experience to say nothing of what will become of this area if they are allowed to begin full scale mining at which time calling this area Wild and Scenic would be like calling the Berkeley Pit at Butte Montana Wild and Scenic. Anything BLM can do to dissuade this activity is important.</p> <p>Over the past years there have been plans to pave the Denali Highway which in my opinion would again subtract from the rustic nature of the area. Reasons given often include safety (in my opinion people who now go 35mph will then go 65mph). Another reason often given is high cost of current maintenance. Anyone who drives the Glennallen area and observes the constant yearly need for pavement repairs due to frost heaves and etc. has a difficult time envisioning paving in this area as a money saving move.</p> <p>Thank you again for the opportunity to comment on the things that seem to me to be of the utmost importance in keeping this one of the most unique and beautiful areas of the state.</p>	<p>Alternatives developed in the Delta River Management Plan (DRMP) will consider future facility development and property acquisition. The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-motorized boating within navigable sections of the river corridor. Helicopter traffic related to mining activities located outside the river corridor is not subject to BLM jurisdiction, however, the BLM will consider methods to analyze and address these activities during the development of alternatives in the DRMP. The Denali Highway is managed and maintained by the Alaska Department of Transportation and Public Facilities (DOT&PF), and any future plans to pave the highway, as well as public comment opportunities regarding, should be directed towards the DOT&PF.</p>	<p>No change to scoping issues or planning criteria.</p>

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3	Peter Nichols Boy Scout Troop 56	<p>Hello, I am responding to a letter I received from BLM asking for public input on the Delta River Management Plan. I was fortunate enough to be able to spend five full days rafting, camping, and fishing along the Gulkana River last summer. My trip involved three boy scout patrols (10-11 per patrol including adults) staggered over a three week period during the months of late June early July. I have very little negative comments regarding the experiences I had during my five days on the river. The fishing was incredible, facilities were great, and the local folks from the area were very gracious. As a watershed manager in New York State, I will address each implementation action individually based on my limited experience in the region as well as concerns I remember being voiced by our Wasilla based field guide.</p> <p>Administrative: I feel there should be rules enforced for carry in carry out expectations on public campsites. The boy scouts we brought on the trip with us had to clean up after unscrupulous campers who proceeded them at certain camp site.</p> <p>Management: There seems to be some contention that motorized “speed boats” are having a negative impact on certain aspects of the Alaska experience (at least where the Gulkana is concerned). I do know that I observed countless areas where severe erosion is occurring. This erosion is creating “sweepers” or overhanging black spruce which is creating a hazard to boaters/rafters and possible water quality issues (i.e. sedimentation and turbidity are probably occurring by default as well). I know this will occur anyway as a natural order of things, but I can’t imagine that wakes being created by speed boats isn’t exasperating this problem as well.</p> <p>Marketing: I honestly never heard of the Gulkana River before last year. I think that speaks volumes to the pristine condition I saw when I visited last year. Too much marketing leads to over exploitation and difficulty in management because of the number of stakeholders generated as a result. Be very careful here!</p> <p>Monitoring: New York State uses creel surveys to assess condition of most of their fisheries. This accounts for fishing success and monies being spent by anglers at local establishments. The fish and invertebrate populations present within the water body is going to be your ultimate gauge as to whether or not your management goals are being achieved. Successful angling will only result from a balanced ecosystem housing sustainable species diversity. Once your food webs collapse, so does your economy (it’s been proven).</p> <p>Good luck, and keep up the good work!</p>	It appears that your comments are directed primarily towards the Gulkana River. If you have any comments specific to the Delta River Management Plan planning process, please provide for consideration during the public comment period for the environmental assessment.	No change to scoping issues or planning criteria.
4	Christopher E. Zimmerman Private Citizen	I am writing to comment on the scoping process for the Delta River Management Plan in response to BLM's letter of July 2008. I have reviewed the information on the website including the maps and information regarding the various "zones". I have been a user of the Delta River valley for at least 15 years. I hunt and fish along the river. I have spent all or most of moose season in the valley for at least 10 years. I access the	Visitor use data and trends, including data citations, will be included in the environmental assessment. The BLM will work cooperatively with the State of Alaska on management issues	No change to scoping issues or planning criteria.

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		<p>area of Eureka Creek to above Garrett Creek by riverboat. Thus, motorized boating is one of my major concerns.</p> <p>Despite the assertions in the website information, I have not seen any major increase in river usage in recent years. This is particularly true during hunting season. I have also not seen any major conflicts between motorized and non motorized users. I have assisted numerous canoeists and rafters when they had problems during their floats of the river. I view motorized use of the river as, in part, a safety net for those who get into trouble. I think that motorized use and non motorized use can, and do, peacefully co-exist and are mutually beneficial.</p> <p>I strongly oppose any restriction or attempted restriction of motorized boating on the section of the River from the take out on the Richardson Highway to the portage. As I am sure you are aware, this section of the River is certainly "navigable" and motorized boating is a traditional use.</p> <p>I do not believe that BLM needs to attempt to "regulate" human waste disposal or camping in the area delineated above. This is based upon my observations over the many years I have used the valley. Perhaps education regard to cutting live trees might be helpful since one of the areas in which I camp had live trees cut by someone. It may have been NOAA as they have a river gauge in the area of Garrett Creek.</p> <p>In regard to ORV use, this too is a traditional use which has been going on for longer than I have been using the river. I do not see any significant adverse impacts from this use. ORV's are used by many in hunting, fishing and other subsistence activities.</p> <p>In sum, I think that the best thing that BLM can do is continue the sort of monitoring and management that it has been doing. Nothing can spoil a wilderness experience more than unjustified restrictions or over regulation.</p> <p>I thank BLM for the opportunity to participate in this process and would appreciate being kept informed of proposals and developments. If I can be of further assistance, please feel free to contact me.</p>	<p>related to motorized and non-motorized boating within navigable sections of the river corridor. Monitoring by river crews throughout the river corridor over the past two years has shown an average of more than 20% of campsites with visible human waste and/or toilet paper. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law.</p>	
5	Bette Wright Private Citizen	<p>My name is Bette Wright. My husband, Richard, and I are property owners on the east side of Round Tangle Lake. While we have owned the property for more than 30 years, we have just this summer built a cabin there. My husband has hunted and fished on the Delta River every moose season for the last 15 years. They usually set up their camp near Garrett Creek. We attended the Benefits Based Management focus group meeting in Fairbanks in 2007.</p> <p>We do not agree that there has been an increase in the number of users of the Delta River over the last 20 years. While there are a lot of people who travel the Denali Highway in the summer, those travelers are not using the Delta River corridor or the Tangle Lake Lakes facilities. We have spent a lot of time the past two summers at Round Tangle Lake both during the week and on the weekends. The camp ground has</p>	<p>Visitor use data and trends, including data citations, will be included in the environmental assessment. The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-motorized boating within navigable sections of the river corridor. Monitoring by river crews throughout the river corridor over the past two years has shown</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>not been heavily used, not even on the 4th of July. We have seen very few canoes (no rafts) heading out to float the river, and the men say there are fewer people hunting and floating the river every year in the area where they hunt. We go to the day use area across the bridge on the south side of the highway to get water, and there frequently are no vehicles parked at the boat launch and we never see anyone using the picnic tables or the fire pits. That area just does not seem to be as popular as it was when we first started going down there in 1973.</p> <p>Having said all of that, we see no need to limit the use of motorized vehicles and boats. The power boaters and the canoeists have been sharing the lakes and the rivers for years. There are lots of canoeists and rafters who are alive today because they were rescued from the river by someone with a power boat, but even those events have gotten fewer and fewer in the last five years. The same is true with off highway vehicles; there just aren't that many people who use ATV's. The country is too rugged for people to roar around on four wheelers. The hunters who have ATV's use them to get up out of the river corridor to hunt and to haul meat out. We would like to be able to use our own four wheeler to explore the country around our cabin on the lake. We do not snow machine, so we have no knowledge of the use of the area after the highway closes.</p> <p>We agree that the campground needs some renovation, especially if the campsites where the river flows into the lake were restored. They were always our favorite sites to set up our tent. The improvements to the day use area on the south side of the highway are well done and very nice. BLM is to be congratulated on the work you've done there.</p> <p>We would oppose the federal government acquiring one of the lodges for a visitor center. There's no need for such a facility; the groups traveling the highway we've met have all had knowledgeable guides and with the exception of the birders, most of them are just traveling the highway. There is so little private property available there that it would be a shame to have any of it come under government ownership. Beside, how would BLM man the place and keep it open?</p> <p>I think that those of us who use the Delta River area regularly are very good stewards of the land. We're careful with our waste disposal, we don't cut live trees and we help others who are in distress. We don't need or want a lot of new rules and regulations; the lack of them is what keeps us going back every year and why my husband and I have invested a lifetime of savings to build our cabin after 30 years.</p>	<p>an average of more than 20% of campsites with visible human waste and/or toilet paper. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives developed in the Delta River Management Plan will consider facility development and property acquisition.</p>	
6	Frank Lombardo Private Citizen	<p>Thank you for the opportunity to comment in this public scoping process. I have used the Tangle Lakes Zones 1 thru 3 since the early 1960's. I love this country and wish to see it remain as it is now. The management plan in place over these years has allowed it to retain the degree of primitiveness I seek here. I believe that control of</p>	<p>The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-motorized boating within navigable sections</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>mechanized use on land is the major determinant for protecting its' current primitive status. There are many areas of ORV access throughout the Denali Hwy, but this area should be retained as a non-mechanized area. I feel that foot or boat access to the land is somewhat self limiting so that areas further from the hwy require more effort and consequently receive less pressure. This, I believe, is the way it should remain. I applaud the maintenance efforts BLM has done in keeping up the facilities in the CG's and Wayside here. They are much appreciated and are very adequate for roadside stays. I hope that my grandchildren will have the opportunity to enjoy this land as I have for the last 45 years.</p>	<p>of the river corridor. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives developed in the Delta River Management Plan will consider facility development and property acquisition.</p>	
7	State of Alaska Dept. of Transportation	<p>The State requests that BLM consider state transportation planning policies and documents relevant to the Delta River Management Plan. The State recently released an update of the Statewide Long-Range Transportation Policy Plan and is currently engaged in the development of the Interior Alaska Transportation Plan with completion scheduled for late 2009.</p> <p style="padding-left: 40px;">Let's Get Moving 2030, Alaska's Statewide Long-Range Transportation Policy Plan http://dot.alaska.gov/stwdplng/areaplans/lrtpp/SWLRTPHome.shtml Interior Alaska Transportation Plan http://projects.ascg.com/iatp/default.asp</p> <p>The State of Alaska Department of Transportation and Public Facilities (DOT) is also responsible for state airports, transportation corridors, and the ferry system. Where applicable, we request the plan address potential airport expansion for both economic development and for runway expansion as population centers continue to grow and air travel needs of rural communities continue to expand, as well as access roads to such existing and future facilities. Of particular importance in this rural planning area are transportation corridors for resource development, and rural airports.</p> <p>The State requests that BLM recognize the pressing need to provide for the efficient development of utility corridors, including corridors for the transport of oil and gas and other mineral resources, as well as transportation corridors to support continued economic growth both at the state and local levels.</p>	<p>The Delta River Management Plan will address airstrip construction, fueling and aircraft maintenance within the management area. Alternatives will be developed in compliance with the Alaska National Interest Lands Conservation Act (ANILCA) Title XI and 43CFR36 pertaining to transportation, utility systems, and access in Alaska conservation system units. Subsistence uses and access to subsistence resources will be addressed consistent with ANILCA Sections 810 and 811. These alternatives will include specific criteria consistent with Title XI of ANILCA, 43CFR36 and the Wild and Scenic Rivers Act so that applications for future right-of-ways within the corridor may be reviewed relative to maintenance or enhancement of resource values.</p>	No change to scoping issues or planning criteria.

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8	Kaarle Straley Private Citizen	<p>Please consider the following comments regarding the Delta River Management Plan scoping.</p> <p>My personal experiences in the planning area have included canoeing, fishing, hiking, wildlife viewing, and camping in each of the five designated zones. The naturalness of these zones (excepting zone 3) are their greatest attribute in my mind, and I believe the lists of "targeted outcomes" have been designated very appropriately for each of these zones, and achieving those targets should remain the management objective.</p> <p>All zones could benefit from efforts to minimize the apparent abundance of campsites, in particular zones 1 and 4. My observation has been that zone 2 is rather heavily used, so it may actually be beneficial for many of the established fire rings and campsites to remain obvious to keep camping use concentrated in those already impacted areas.</p> <p>I would also be supportive of regulations limiting group size and the kinds of camping equipment allowed. I was recently dismayed to find a large hunting camp within zone 5 with an enormous footprint and an excess of gear that had been powered in on a loud and fast moving inboard jet boat. this included a number of OHVs that were off of designated trails, enormous wall tents, and what looked like a television. The presence of this camp greatly diminished our passing group's ability to enjoy the targeted experiences for this zone.</p> <p>Lastly, I would request that helicopter traffic, particularly low flying traffic, be restricted from zones 1 and 4.</p> <p>Thank you very much for considering these comments.</p>	<p>Your comments will be considered in the development of alternatives and management actions for the Delta River Management Plan (DRMP). Helicopter traffic and airspace are not subject to BLM jurisdiction, however, the BLM will consider methods to analyze and address the effects of these activities during the development of alternatives in the DRMP.</p>	<p>No change to scoping issues or planning criteria.</p>
9	Michele Kern Private Citizen	<p>I am writing in response to the Delta River Management Plan that is currently in process. I have read the literature that was emailed by your office regarding the public scoping process and the events that have taken place to date, and have some concerns with zones four and five.</p> <p>My family has been actively using the Delta River corridor for over 60 years now for recreational and hunting purposes. The area under review has provided many family members and close friends with life experiences and lessons that we hold strong to this day. Additionally, to us this isn't just any river within the state, as many of us grew up learning about the great Alaskan wilderness and survival through our experiences on this river. It is safe to say that we have a vested interest in maintaining the natural beauty as well as wildlife within the area to be able to pass these experiences and lessons on to our children and their children.</p> <p>Over the past few years I participated in the 2005 Delta River Recreation User Survey as well as the Benefits Based Planning Process meetings that were held. The main concerns that I have with this planning process is not the fact that BLM wants to</p>	<p>All interested parties have been given an opportunity to comment, and management alternatives will be developed that provide for different management options within the river corridor, seeking to balance various uses and users groups in a way that promotes multiple uses of the resource while still protecting the resource. Navigable sections of the river are under the jurisdiction of the State of Alaska. The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>update the existing plan from 1983, but the manner in which they are doing it. The planning steps have divided the user groups into the “motor-heads” and the “non-motor heads” and have basically played them against each other rather than developing plan to fit both of their desires and interests. During the survey process and even the discussion groups the questions that were asked were geared towards eliminating motor access on the river as well as within the river corridor. Now, with the proposed changes it is obvious that the motivation behind the updated plan is not simply to update it for the management of the current and potential future use of the river, but to manage one whole user group out of the river valley all together.</p> <p>In the current literature that was emailed to me regarding this scoping process it states that there is a concern with the increased usage of the river valley. I am not sure where this information has been collected because the overall usage on the lower section of the river is low to begin with and this has even decreased over the past few years. Additionally, there is not a concern of a major increase of riverboat activity as the nature of the river will keep this from ever becoming an issue. To eliminate river boats to benefit the “non-motor heads” is discriminating against the “motor-head” user group. Just because river boats use a motor does not mean they are causing damage to the terrain or environment and therefore they should not be punished for their choice of transportation.</p> <p>Additionally, the literature states that all terrain vehicles will be limited to certain trails, however, there are other decade old trails in the vicinity that have been eliminated from the list, again limiting access by a specific user group.</p> <p>The literature also describes the potential of BLM operating a visitor’s center and disseminating marketing materials. These are interesting aspects as both of these mechanisms are typically used to increase the use of an area, which would in turn increase the impact on the environment. So in essence, BLM is escalating the issue as they are the ones who are trying to increase the over all usage of an area that still maintains limited use. Additionally, they are creating limited access for a preferred few.</p> <p>One last comment, the scoping meeting that are currently scheduled for the month of September are ironically during the last week of moose hunting season. I only have to wonder if the timing of these meetings isn’t a tactical ploy on behalf of BLM to reduce comments from a particular user group. It would be nice if the "motor head" group was able to have the privilege and rights to use this river corridor along with the "non-motor head" group.</p> <p>I am very interested in the management plan for the Delta River and would like to receive future information regarding the status and future comment periods.</p>	<p>motorized boating within navigable sections of the river corridor. Visitor use data and trends, including data citations, will be included in the environmental assessment. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives developed in the Delta River Management Plan will consider facility development, marketing methods, and property acquisition within the management area. There were no scoping meetings scheduled or advertised during the month of September. Public scoping for this plan opened on July 15, for sixty days, ending on September 15.</p>	

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10	Geoffrey Orth Board President Alaska Trails	<p>We appreciate the opportunity to comment on the update of the Delta River Management Plan. Alaska Trails is a statewide, nonprofit trails advocacy group, and many of our members use the Delta River area for variety of activities. It is a place of unique wild splendor. While we don't have any specific recommendations regarding this area, we would like to comment in general on trail management.</p> <p>Alaskans and visitors to Alaska have used this area for years to engage in many activities, such as boating, hiking, photography, berry picking, trapping, fishing, hiking, and hunting. This not only gives Alaskans a place to recreate and boosts the local economy, it also adds yet another attraction to our state's strong tourism industry. Most visitors especially need the guidance offered by trails in order to truly enjoy the wild experience of Alaska.</p> <p>While we advocate for trails, our group also knows that part of the attraction of the Delta River area is that it is relatively primitive. We don't believe there should be a huge effort to tame the trails of the area or put in more trails. But this area is becoming more popular. As increasing numbers of visitors come to the Delta River area, more resources are needed to properly deal with trail management. The government should upgrade existing trails to sustainable standards or build new trails, when needed, such as was recently done in the Tangle Lakes area.</p> <p>Bureau of Land Management staff should poll trail users to determine where more directional and etiquette signs would be helpful. Staff should also be alert for potential conflicts between motorized and non-motorized users and try to find ways to avoid such conflicts.</p> <p>We have generally been pleased with trail management in the area, but we feel that the area will get more and more visitors in the future. We hope that the government will continue to plan ahead to avoid problems with trails in the Delta River area.</p>	As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. The maintenance and management of any new and existing trails will be specified in the new plan.	No change to scoping issues or planning criteria.
11	Elizabeth Hatton Board of Directors Alaska Quiet Rights Coalition	<p>The following are the scoping comments of the Alaska Quiet Rights Coalition ("AQRC") on the Delta River Planning Process. Thank you very much for the opportunity to participate in this important process.</p> <p>A. About AQRC, and General Comments on the Natural Soundscape in Alaska</p> <p>The Alaska Quiet Rights Coalition (AQRC) is dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, wildlife, visitors, and future generations.</p> <p>Alaska's natural beauty, wildness, wildlife, expanses of undisturbed open space, and peace and quiet are among its most cherished values—and Alaskans, our visitors, and future generations have the right to experience the natural sights, sounds and quiet beauty of our state. In the vast majority of cases, the obtrusive noise, summer landscape degradation and winter snowscape defacement, exhaust, and dangers of motorized recreation are incompatible with those special natural experiences.</p>	Your comments concerning the natural soundscape will be considered in the development of alternatives and management actions for the Delta River Management Plan (DRMP). The BLM agrees that the targeted experience in the Recreation Management Zones regarding noise should be changed from "escaping noise" to "enjoying natural quiet and natural sounds." Suggestions regarding motorized	Effects to the natural soundscape will be considered in the development of alternatives. An additional planning issue entitled "Natural Quiet and Natural Sounds" will be added to the planning

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		<p>Unfortunately, though, natural quiet and the opportunity to hear and enjoy natural sounds are increasingly hard to find in our state—a fact which would surprise the great majority of non-residents for whom Alaska is a potent symbol of the natural and the wild, not of artificial, noisy mechanization. Although there are many places in Alaska that look the same as they did 100 or more years ago, very few sound as they did only 10 or 20 years earlier.</p> <p>Consequently, not only do we need to protect those quiet areas that still remain, but we need to restore many previously quiet lands to their former, more natural, more pristine condition. Nor is AQRC’s goal a purely negative one (that is, the elimination, in at least some significant portion of the outdoors, of artificial noise). Our hope is to re-create the opportunity to both enjoy natural quiet for its own sake, and to be able to hear and enjoy, without noisy distractions, the beauty of natural sounds like chickadee songs, raven calls, leaves rustling in the wind, and even the quiet, just audible descent of falling snow.</p> <p>Most of us, until quite recently, took the restorative quiet of the outdoors for granted. We assumed that the backcountry would always provide a quiet refuge from the noise, busyness and artificiality of our towns and cities. That assumption, to our great chagrin, has proven to be false. We now know that natural quiet and natural sounds require our—the public, and the public’s stewards, the land managers—constant vigilance if they’re to survive even into the middle of our present century.</p> <p>Ironically, accessible natural quiet can be easier to find in the lower 48, in the many designated Wildernesses where motorized recreation is prohibited, than in supposedly wild Alaska, where many federal land managers erroneously believe that ANILCA requires them to allow obtrusive recreational activities, such as snowmachining, even in designated Wilderness. Recreational snowmachining, inaccurately characterized as “traditional,” is allowed in spite of a number of adverse impacts and the conflicts it often creates with truly traditional, low impact means of access like walking, snowshoeing and cross country skiing.</p> <p>AQRC believes in a fair and balanced allocation of the state’s public lands for both non-motorized and motorized recreation—there is plenty of room for both. At the present time, there is a gross imbalance on the public lands that both unwisely and inequitably favors motorized recreation over muscle-powered recreation. In the interests of both good stewardship and fundamental fairness, this imbalance needs to be rectified—thereby also helping to protect clean air and water, fish and wildlife, scenic beauty, and the wilderness character for which Alaska is famous worldwide.</p> <p>Natural quiet and natural sounds should be recognized by all public land managers as critical resources in and of themselves that deserve no less consideration than clean air and water, or fish and wildlife and their habitat. Soundscape plans should be prepared. The analysis of proposed agency actions should include a determination of</p>	<p>boating within the management area will be considered in the development of the alternatives and management actions. Navigable sections of the river are under the jurisdiction of the State of Alaska. The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-motorized boating, as well as aircraft landings directly on the water column, within navigable sections of the river corridor. The DRMP will address airstrip construction, fueling and aircraft maintenance on BLM managed lands within the management area. Aircraft traffic related to mining activities located outside the river corridor is not subject to BLM jurisdiction, however, the BLM will consider methods to analyze and address these activities during the development of alternatives in the DRMP. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives will be considered that make distinctions between recreational ATV use and ATV use</p>	<p>issues to be analyzed in the development of the plan. In the Special Recreation Management Zones targeted outcomes, “escaping noise” will be replaced with “enjoying natural quiet and natural sounds.”</p>

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		<p>the possible effects on natural quiet and natural sounds and on the humans and wildlife that enjoy or depend on them.</p> <p>AQRC’s focus in these comments, consequently, will be on minimizing noise impacts, primarily from motorized recreational vehicles, but also from other artificial noise sources. But as we said above, minimizing those impacts provides other benefits as well, all of which are important to us and to many others—helping to protect clean air and water, fish and wildlife, scenic beauty, and wilderness character. And, finally, the vast majority of AQRC’s members and supporters, and others with a similar interest in natural quiet and natural sounds, are seeking not only a quiet experience, but one that is natural in other ways as well, and that provides the chance to enjoy primitive, muscle-powered forms of recreation in a high quality environment.</p> <p>B. More Specific Comments on Delta Wild and Scenic River Planning</p> <p>The existing Delta River plan (1983) recognizes the natural, primitive and scenically beautiful character of the entire river, but especially in its Wild segment (see, for example, p. 5 (“provides viewing pleasure equal to the best Alaska has to offer”); p. 7 (“There are outstanding scenic values in the area”); p. 20 (“Most of the watershed of the Delta River remains in an undisturbed natural condition”; “Most of the scenery around Tangle Lakes and the wild stretch of the Delta River is outstanding and is in a natural primitive condition”); p. 34 (“The ‘wild’ sections of the river corridor will be managed to maintain existing natural scenic qualities”); p. 9 (suggests an intent to protect the primitive values of the Tangles and the Clearwater section of the Delta); p. 18 (notes that competitive events could lessen a primitive experience on the Wild segment of the river (and at p.31 prohibits them there)); and p. 17 (suggests that opportunities to find solitude are worthy of protection)).</p> <p>The 1983 plan also recognizes, with regard to what are AQRC’s areas of emphasis, the impacts of motorized recreation—for example, that the noise of the larger boats and motors on the Tangles “have caused conflicts with floatboaters and other recreationists” (p. 13), and that “Aircraft landing and take off within the river corridor could diminish the primitive qualities for which the river was designated” (p. 13).</p> <p>These numerous illustrations of the natural, scenic and primitive qualities of the Delta Wild and Scenic River, and of the value of protecting them, would lead one to believe that sufficient management actions would be taken by BLM to protect those very important values. And, certainly, a number of steps, for which BLM clearly deserves credit, have been taken to help maintain those outstanding existing conditions.</p> <p>But especially considering that on the vast majority of state owned and BLM managed lands in the region there are no effective controls on motorized recreational vehicle use (the Tangle Lakes Archeological District (“TLAD”) is a partial, but far from satisfactory exception), and that the planning area has received a special designation from the Congress and deserves a particularly high level of stewardship,</p>	<p>related to subsistence activities, and management options for both types of ATV use. Mining uses that occur on lands that are adjacent to the management area are not under the jurisdiction of the BLM, and will not be considered in the development of alternatives. Marketing options for the area will be considered in the development of alternatives.</p>	

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		<p>quite a bit more needs to be done if those natural, scenic and primitive qualities are to be adequately and responsibly protected. Our specific recommendations follow.</p> <p>1. Natural quiet.</p> <p>i. At page 4 of the Bulletin, several activities and resources are listed for which the Plan “will propose a reasonable range of management alternatives and associated impacts.” Added to this list, or to the list of issues and concerns that starts at page 3, should be “Natural Quiet and Natural Sounds.”</p> <p>ii. In the Special Recreation Management Zones materials mailed to us, “escaping noise” is listed as one of the targeted experiences. Added to this negative sounding experience should be added the more positive experiences of “enjoying natural quiet and natural sounds.”</p> <p>2. Watercraft.</p> <p>a. Jet skis, airboats, and hovercraft. These types of watercraft are EXTREMELY noisy and irritating, and they can, and of course sometimes 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</p> <p>b. Other watercraft.</p> <p>i. Motorized watercraft should continue to be prohibited in the Wild segment of the corridor.</p> <p>ii. Since accessible non-motorized opportunities are so rare in the region, serious consideration should be given to making all of the Tangle Lakes non-motorized. That would be our preferred option. Another possibility is making the upper Tangles, and the lower Tangles except for Round Tangle, non-motorized; that would restrict the motorized use to the lake directly adjacent to the developed campground, on the busier, campground side of the highway (an exception could perhaps be made for the other lower Tangles during the September moose hunting season). Any motorized use that does occur on the Tangles should be limited to electric motors, or gas motors of no more than 5 horsepower (here also an exception could perhaps be made during the September moose hunting season if larger motors (up to 15 horsepower) are required for safety or other practical purposes).</p> <p>iii. We of course support “recommend[ing] limitations to the State of Alaska on motorized powerboat use within the SRMA.”</p> <p>3. Aircraft.</p> <p>i. Aircraft should continue to be prohibited on the water surface of the Wild segment of the corridor, but that restriction should be extended to terrestrial landings there as well.</p> <p>ii. Unless a strong rationale for airplane landings somewhere on the Tangles can be demonstrated, they should be disallowed there. Certainly, there should be no landings on the upper Tangles, or on the lower Tangles except perhaps for the lake adjacent to</p>		

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		<p>the developed campground (Round Tangle). If landings are allowed to continue on Round Tangle or other lakes, the level of use should be monitored. Use should not be allowed to increase significantly from the current level.</p> <p>iii. Aircraft overflights, especially commercial ones for purposes like flightseeing or resource extraction, can create serious adverse impacts for both passive and active recreationists (as well as home and cabin owners) 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.</p> <p>4. ATVs. We don't support the use of ATVs anywhere in the corridor (including in the campground, where they can be a major annoyance, much more so than most of the other generally expected noise sources there; this being said, generator use in the campground should also be regulated, if it isn't already). There are LOTS of other places to use them besides this congressionally designated unit. We fail to see the logic in disallowing motorized watercraft in the Wild segment, but allowing ATVs there. For us, and for many others, there is nothing "wild" about motorized recreational vehicles. There are very few things which more emphatically tame wild areas than motorized vehicles. BLM seems to recognize this incompatibility with regard to powerboats, but not with regard to ATVs.</p> <p>5. Mining. The single exploratory mining drill hole at about Mile 14 of the Denali Highway was quite noisy, and was visible for over two miles along the highway--and presumably for many more miles to hikers or other users at higher elevations. What would a large-scale industrial mine—which would include a new road or roads, as well as increased traffic on existing highways, and possibly on-site power generation, or transmission lines, etc.—sound and look like? Certainly both the noise and the visual impact would be totally incompatible with the type of experience that is meant to be provided by designating a Wild and Scenic River. BLM should do everything in its power to prevent the development of a mine that would destroy the high quality recreational experience not only sought, but expected, by users of the designated corridor. More than just the relatively narrow river corridor needs to be protected if the benefits of the designation are not to be sacrificed.</p> <p>6. Marketing. This area is quite well known to many individual Alaskans and tourism operators (including Princess Tours), and is visited as well by a number of independent</p>		

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		<p>travelers. Additional marketing is not only unnecessary, but it would most likely result in excessive traffic and crowding, thereby significantly degrading the existing character and attractiveness of the area.</p> <p>Thank you again for this opportunity to participate in this important planning process.</p>		
12	Eric Troyer Vice President Interior Trails Preservation Coalition	<p>Land- and water-based trails are extremely important in the Delta River area. This area is a place special for its wild, scenic beauty. For years people from Alaska, have been coming to the Delta River area for a variety of activities, such as hunting, fishing, boating, hiking, berry picking, and birdwatching.</p> <p>Besides Alaskans, this area also draws people from around the United States and around the world. It is one of the reasons Alaska has such a strong tourism industry. Few places can offer the expansive wild beauty that Alaska has to offer. Land- and water-based trails are necessary to allow these people to participate in and fully enjoy that wild experience.</p> <p>The Interior Trails Preservation Coalition was formed to advocate for trails in interior Alaska. Many of our members use the Delta River and Tangle Lakes area for a variety of purposes. While we are strong trail advocates, we appreciate the wild and relatively primitive nature of this area. We do not see a need for a massive investment in trail development.</p> <p>However, as the area becomes more popular, we believe more resources will be needed for proper trail management. Where traffic is heavy, the Bureau of Land Management should consider modifying existing trails to sustainable standards or building new trails. The sustainable foot trail started this year in the Tangle Lakes area is a good example of this approach.</p> <p>Higher use trails would also benefit from some directional and etiquette signs to make the trail experience more enjoyable. And while we support multi-use trails, we also understand that some trails may need to be non-motorized to reduce conflicts between motorized and non-motorized users. However, we do not know of any current conflicts between motorized and non-motorized users in this area.</p> <p>Our group does not have any specific trail recommendations for the update of the Delta River Management Plan. Generally we have been pleased with BLM management of this area. We predict the area will receive an increasing amount of visitors and we hope that BLM will plan ahead to avoid trail degradation and trail user conflicts.</p>	<p>As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. The maintenance and management of any new and existing trails will be specified in the new plan.</p>	<p>No change to scoping issues or planning criteria.</p>

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13	Cliff Eames President Board of Directors Copper Country Alliance	<p>The following are the scoping comments of the Copper Country Alliance (“CCA”) on the Delta River Planning Process. CCA’s mission is “protecting the rural and wild natural environment of the Wrangell Mountains/Copper Basin region,” including nearby areas that are important to the individuals in the region. Consequently, our general goal in this planning process would be to maintain, or in some cases enhance or restore, the natural, wild (or primitive) environment of the corridor, as well as of those surrounding lands which are part of the experience expected and enjoyed by users of the corridor.</p> <p>Among the long-standing activities there that we believe are of particular importance to many local residents, other Alaskans, and visitors, and are especially deserving of protection, are fishing, hunting, berry-picking, hiking, camping, canoeing, bird and other wildlife watching, and other nature study.</p> <p>Some of the most important resources and values in the area that need careful monitoring and protection are fish and wildlife (both game and nongame) and their habitat (good examples are grayling and, of course, of special importance to subsistence hunters, sport hunters, and wildlife watchers, the Nelchina Caribou Herd); subsistence; cultural resources; the incredible scenic beauty of the alpine landscape (scenic resources are all too often inadequately protected, perhaps because their appreciation is somewhat subjective and they are not as easy to quantify as, for example, populations of fish and wildlife); soils and vegetation; clean air and water; clear, star-filled night skies free of light pollution; natural quiet and the opportunity to hear and enjoy natural sounds; solitude (to varying degrees of course within different parts of the corridor); the many beautiful and interesting wildflowers; and the great variety of birds, some of which, like the Arctic Warbler, are special targets not just of Alaskans but of people from throughout the country, as well as other birds which also are less frequently seen in many other places, especially from the road system (like Gray-cheeked Thrushes, Whimbrels, Jaegers, and Golden Plovers).</p> <p>SPECIFIC RECOMMENDATIONS</p> <p>1. Possible large-scale industrial mining on nearby lands poses a very significant threat to recreationists on the Delta Wild and Scenic River (called “the corridor” below). BLM should do whatever it can to prevent activities beyond the corridor from adversely affecting recreationists within it. It would not be responsible stewardship to take a hands-off stance just because the mining activities are outside the corridor.</p> <p>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</p>	<p>Mining uses that occur on lands that are adjacent to the management area are not under the jurisdiction of BLM, and will not be considered in the development of alternatives. Alternatives will be developed in compliance with the Alaska National Interest Lands Conservation Act (ANILCA) Title XI and 43CFR36 pertaining to transportation, utility systems, and access in Alaska conservation system units. Subsistence uses and access to subsistence resources will be addressed consistent with ANILCA Sections 810 and 811. These alternatives will include specific criteria consistent with Title XI of ANILCA, 43CFR36 and the Wild and Scenic Rivers Act so that applications for future right-of-ways within the corridor may be reviewed relative to maintenance or enhancement of resource values. Commercial and visitor use limits, future facility development and property acquisition, and marketing options for the area will be considered in the development of alternatives. Suggestions regarding motorized boating within the management area will be considered in the development of the alternatives and management actions. Navigable sections of the river are under the jurisdiction of the State of Alaska. The BLM will work cooperatively with the State of Alaska on management issues</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>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.</p> <p>2. Commercial berry-picking in the area has been proposed 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.</p> <p>3. We support possible limits on visitor and commercial use, as well as other actions to eliminate or minimize unnecessary impacts from recreation and maintain the natural, primitive character of the corridor (see second bullet on page 3 of the Bulletin). We also support the prohibition of competitive events on the Wild segment of the corridor.</p> <p>4. We believe that BLM should take aggressive action to try to acquire the lodge and adjacent lots that are for sale just down the road from the campground. Not only would BLM ownership prevent further private development and its impacts in an area with such incredibly high public values, but the site would make an excellent location for a BLM/State of Alaska visitor center that could both dispense practical information about the area and interpret its natural and cultural history.</p> <p>5. 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.</p> <p>6. We agree that facility development should be minimal. In most segments of the corridor it should serve primarily to protect resources from visitor impacts.</p> <p>7. Motorized use generally. There are many opportunities in the Copper Basin and adjoining regions to enjoy motorized recreation and motorized hunting and fishing. 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.</p> <p>8. Motorized watercraft should be prohibited on the Wild segment of the corridor.</p> <p>9. Aircraft landings should be prohibited not just on the waters of the Wild segment of the corridor, but on the lands in that segment as well.</p> <p>10. ATV use should be prohibited throughout the corridor, but especially in the Wild segment. It's illogical to protect the wild values of that segment by prohibiting most aircraft landings but then allowing ATV use.</p> <p>11. Aircraft 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</p>	<p>related to motorized and non-motorized boating, as well as aircraft landings directly on the water column, within navigable sections of the river corridor. The Delta River Management Plan (DRMP) will address airstrip construction, fueling, and aircraft maintenance on BLM managed lands within the management area. Aircraft traffic related to mining activities located outside the river corridor is not subject to BLM jurisdiction, however, the BLM will consider methods to analyze and address these activities during the development of alternatives in the DRMP. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the East Alaska Resource Management Plan (EARMP) will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives will be considered that make distinctions between recreational ATV use and ATV use related to subsistence activities, and management options for both types of ATV use.</p>	

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		<p>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.</p> <p>12. Aircraft landings on the Tangles should be limited to Round Tangle, which is adjacent to the developed campground and 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.</p> <p>13. Powerboat use on the Tangles should also be limited to Round Tangle, for the same reason. Wakes should be avoided. Boats should be powered either by an electric motor, or by a gasoline motor of 5 horsepower or less. An exception could be made during the September moose hunting season for the use of the rest of the lower Tangles, and for motors of up to 15 horsepower if appropriate for safety or other practical reasons. As with aircraft landings, the level of powerboat use should not be allowed to increase significantly and degrade the experience of campground and other users; again, these use levels could perhaps be monitored by the campground host. Finally, to reduce pollution BLM should consider phasing in a requirement mandating the use of 4-stroke gasoline motors.</p> <p>14. We support recommending to the State of Alaska limitations on motorized powerboat use within the SRMA.</p> <p>15. Hovercraft, airboats, and jet skis are exceptionally loud and obtrusive, and are especially incompatible with a natural and/or primitive experience, solitude, etc. They can also travel over riparian and lacustrine vegetation, both destroying this habitat and badly disturbing the fish and wildlife that depend on it. These watercraft should not be allowed anywhere in the corridor.</p> <p>16. 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.</p> <p>17. The SRMA materials say that Tangle Lakes Zone 1 is classified as semi-primitive, non-motorized. Why then, are motorized boating and snowmachining apparently allowed in this zone?</p> <p style="padding-left: 40px;">Thank you for all the work you're doing updating the management scheme for this very popular and important area, and for the chance to participate in the planning process.</p>		
14	Susan E. Magee ANILCA Project Coordinator Office of Project Management	<p>The State of Alaska reviewed the July 2008 scoping bulletin for the Delta River Management Plan. The following comments represent the consolidated views of the State's resource agencies.</p> <p>The Delta River corridor offers outstanding scenic views, contains historic and cultural resources related to early occupation and settlement, and is a popular destination for fishing, hunting, and other recreational opportunities. Two major trails cross the Delta River providing access within and adjacent to the corridor. These same</p>	The BLM looks forward to working with the State Of Alaska in the development of the Delta River Management Plan. Under the direction of the National Wild and Scenic Rivers Act, outstandingly remarkable values (ORV) for the	No change to scoping issues or planning criteria.

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	and Permitting State of Alaska	<p>trails also provide access for mining on state-owned and selected lands west of the corridor.</p> <p>We appreciate the Bureau of Land Management’s (BLM) continuing commitment to work with the State in the development of the Delta River Management Plan. Among other authorities, the State is responsible for management of the Delta River and its underlying shorelands, as well as fish and wildlife on all lands in Alaska. It is, therefore, important to work cooperatively throughout this planning process to address issues of mutual interest, such as visitor use, surface transportation, and land management under mixed ownership. In particular, we look forward to working with BLM on issues that affect access to state resources and uses on the river.</p> <p>We hope to draw upon the successes of previous collaborative planning efforts, such as the Gulkana River Management Plan. We are aware of the effort already invested by BLM in pre-scoping work through the Benefits Based Management (BBM) process. We expect the information gathered through BBM stakeholder meetings will be valuable when moving forward.</p> <p>We understand the East Alaska Resource Management Plan recommended addressing specific limitations in this planning process, including a request to the State to limit motorized powerboat use. We agree such considerations are more appropriately addressed at this more detailed level of planning. Through a cooperative planning effort, we expect to identify and consider both the underlying issues and the full array of management actions available to address those concerns before determining an appropriate response.</p> <p>Lastly, when formally identifying the Outstanding Remarkable Values for the Delta River during this planning process, we request the legislative history of the Alaska National Interest Lands Conservation Act guide the decision-making process. It is our understanding the legislative history identified scenic, cultural, and recreational values for the Delta River. While the river corridor certainly has other resources and attributes, we agree these stand out as values that qualify as “outstandingly remarkable.”</p> <p>Thank you for this opportunity to comment.</p>	<p>river corridor will be analyzed using the following criteria: Is the value river related or river dependant? Is the value rare, unique, or exemplary in a regional or national context? Outstandingly Remarkable Values are typically identified in a study prior to the designation of a Wild and Scenic River, but the Delta National Wild and Scenic River was designated by the Alaska National Interest Conservation Act (ANILCA), without these specific values identified by Congress. In these cases, managers typically develop ORVs from study reports and other documentation of management activities and intentions. In the 1983 Delta River Management Plan, the ORVs were not explicitly defined, and there is a need to define these values and to associate them with specific management objectives.</p>	
15	Cindy Shogan Executive Director Alaska Wilderness League	<p>Alaska Wilderness League submits the following scoping comments in the hope that they will provide guidance and direction in shaping alternatives for the remarkable Delta River within the East Alaska planning area. We are committed to the protection of the wild resources throughout the planning area and ensuring that appropriate management measures are adopted to protect diversity and sustainability.</p> <p>Our scoping comments pertain to the management of the Delta River National Wild and Scenic River Corridor and the Delta River Special Recreation Management Area. Of particular importance to the League are the issues of:</p> <ul style="list-style-type: none"> ▪ Changes to the East Alaska RMP; ▪ Climate change; ▪ Off Highway Vehicle (OHV) Management; 	<p>The BLM is only required to provide a minimum 30 day comment period on issues and planning criteria during the scoping phase. The BLM sent out more than 1100 letters to interested parties, advertised in two local newspapers, in radio announcements, on the BLM website, and on internet list serves. BLM planning guidelines state that</p>	<p>Climate change and wilderness characteristics will be analyzed only to the extent that they are affected by recreation-related decisions that are developed in the plan, and only</p>

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		<ul style="list-style-type: none"> ▪ Wild and Scenic River Management; ▪ Wilderness Characteristics; and ▪ Analysis of Impacts. <p>We have included resources and references where appropriate. We feel that management prescribed in the East Alaska RMP provides ample protection and that only minor changes are necessary to provide the best possible management of one of our national treasures.</p> <p>I. General Planning and Participation</p> <p>According to the Federal Land Management Policy Act (FLPMA) Section 103 (c), where there are competing resource uses and values in the same area, the BLM must prioritize the management of the land in a combination that will best meet multiple use and sustained yield mandates. With this in mind, the priorities of primitive management areas and Wild and Scenic River Corridors must be reviewed for impacts from incompatible actions – with mitigation measures and protection a priority. The best combination of uses for these designated areas must elevate the natural and wild environment as a priority over development.</p> <p>The scoping period for the Delta NWSR plan, the Delta River SRMA and the amendment to the East Alaska RMP has been inadequate to ensure genuine participation opportunities for the general public for the following reasons:</p> <ul style="list-style-type: none"> ▪ The scoping period was not accompanied by any meetings – an overview of issues and the planning process should have been provided for the public to encourage greater understanding and promote public participation and informed decisions; ▪ The issues to be addressed in the amendment of the East Alaska RMP were not disclosed in the announcement or any other means to the general public – a summary of potential changes, or issues to be addressed should have been a available along with the announcement and on the web; and ▪ The 1983 Delta NWSR plan was not available electronically for review – to encourage public participation this document should have been readily available on the website, even if it only exists in print it should have been scanned and made available at the very beginning of the scoping period. <p>According to the NEPA Sec. 101 [42 USC § 4331], ‘each person should enjoy a healthful environment and ...each person has a responsibility to contribute to the preservation and enhancement of the environment.’ Further as stated in Sec. 102 [42 USC § 4332] the BLM must ‘make available to States, counties, municipalities, institutions, and individuals, advice and information useful in restoring, maintaining, and enhancing the quality of the environment [.]’</p> <p>The BLM has an obligation to ensure adequate information and opportunities for <i>informed</i> participation are available to the public. In light of this, we request and recommend that the BLM extend the scoping period for a minimum of thirty days and</p>	<p>public participation may occur through a variety of methods, including, but not limited to, public meetings. The scoping period was open for 60 days. Depending on the local situation (budget, time constraints) and planning issues, the BLM can conduct a more involved scoping effort. There will be additional opportunities for public involvement during the preparation of the environmental assessment, and public meetings may be considered at this time. Planning issues and criteria were disclosed in the scoping bulletin which was referenced in the cover letter and available for review on the BLM website or available upon request from the BLM. The 1983 Delta NWSR plan has been added to the Delta planning website. Comments regarding climate change, minerals management, and wilderness designation are outside the scope of the planning effort. Decisions regarding these issues have already been made in the East Alaska Resource Management Plan (EARMP) and will not be further addressed in this planning effort. The scope of the resource management plan amendment is only for recreation related management decisions within the planning area. Climate change and wilderness characteristics will be analyzed only to the extent that they are affected by recreation related decisions that are</p>	<p>within the specified planning area.</p>

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		<p>address the issues raised above by making all existing planning documents available, distributing a list of potential changes/issues for amendment in the East Alaska RMP and hold an open house at the Glenallen and Anchorage field offices.</p> <p>II. Changes to the East Alaska RMP</p> <p>The solicitation letter, dated July 2008, states that ‘[t]he LUP Amendment is necessary because changes have been proposed to some of the recreation management decisions that were made in the EARMP.’ None of the potential changes were outlined for review and comment.</p> <p>In discussions with Health Emmons, today Sept 15, 2008, the proposed amendment was explained as being necessary to incorporate the Benefits Based Management Approach for the Delta and future recreation area planning.</p> <p>However, while an amendment is available for discussion we feel certain areas of the East Alaska RMP should be available for review, including readdressing climate change impacts, and minerals management.</p> <p>III. Climate Change</p> <p>Climate Change is one of the greatest threats facing public lands and Alaska’s rural communities, today. The BLM should make this issue a priority, by incorporating it into all planning and management strategies. There is a clear scientific consensus on the impacts resulting from climate change and it is certain that future impacts from climate change will affect East Alaska planning area.</p> <p>The following are points of discussion we believe the BLM should be incorporated into the Delta NWSR plan, the Delta River SRMA and the amendment to the East Alaska RMP. They are as follows:</p> <ol style="list-style-type: none"> 1) Provide training on climate change and variability for all resource managers; 2) Consider climate change and variability as a component of long-range management plans and strategies, as well as prioritizing adaptive management; 3) Implement monitoring and assessment programs for impacts to wildlife and wildlife habitat expected to be most sensitive to climate change; 4) Educate the public about climate change and its effects on Alaska public lands and resources; 5) Establish and maintain migration corridors that allow species movement and vegetation shifts among islands of suitable habitat; 6) Increase buffer zones around identified critical habitat in order to increase options for species under various climate change scenarios; 7) Protect riparian and wetland communities to promote resilience of these important and susceptible habitats; 8) Make the reduction and elimination of human-induced synergistic impacts a top priority for land and resource management; and <p>The BLM should fully integrate these discussion points in the goals and objectives</p>	<p>developed in the plan. Regarding right-of-ways, alternatives will be developed in compliance with the Alaska National Interest Lands Conservation Act (ANILCA) Title XI and 43CFR36 pertaining to transportation, utility systems, and access in Alaska conservation system units. Subsistence uses and access to subsistence resources will be addressed consistent with ANILCA Sections 810 and 811. These alternatives will include specific criteria consistent with Title XI of ANILCA, 43CFR36 and the Wild and Scenic Rivers Act so that applications for future right-of-ways within the corridor may be reviewed relative to maintenance or enhancement of resource values. Navigable sections of the river are under the jurisdiction of the State of Alaska. The BLM will work cooperatively with the State of Alaska on management issues related to motorized and non-motorized boating, as well as aircraft landings directly on the water column, within navigable sections of the river corridor. The Delta River Management Plan (DRMP) will address airstrip construction, fueling, and aircraft maintenance on BLM managed lands within the management area. Aircraft traffic related to mining activities located outside the river corridor is not subject to BLM jurisdiction, however, the BLM will consider</p>	

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		<p>listed for the East Alaska RMP and the Delta NWSR/SRMA plans, not as a separate section on climate change. We request that BLM disclose the assumptions that are made about climate change impacts during the planning process and the ways in which it will be factored into an amendment to the RMP and incorporated into the Delta NWSR plan and the Delta River SRMA plan.</p> <p>Addressing impacts to key resources is critical, as is considering ecosystem level and community implications. The BLM needs to coordinate research, management, and planning with adjacent land managers to ensure that the goals of habitat connectivity and resilience are achieved. The East Alaska Planning Area lands are an important component of a greater conservation system, and future planning needs to consider the role of these lands beyond their borders from an ecosystem perspective anticipating the future impacts of climate change.</p> <p>Climate change is certain, and is already having profound impacts in Alaska. The East Alaska RMP, as well as other BLM and federal land management plans in Alaska, have failed to address climate change in a quantitative and comprehensive manner – using the unfounded argument that there is too much uncertainty about climate change. We remind the BLM that the IPCC has concluded that “Warming of the climate is unequivocal” and “Most of the observed increase in globally averaged temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic greenhouse gas concentrations” (IPCC, 2007). The recent CCSP report also reiterates this point specifically for federal land management agencies: “While there will always be uncertainties associated with the future path of climate change, the response of ecosystems to climate impacts, and the effects of management, it is both possible and essential for adaptation to proceed using the best available science” (CCSP, 2008).</p> <p>Uncertainty is prevalent in all actions and impacts that the BLM considers when planning, and cannot be used as an excuse for failing to develop a range of possible impacts and assessing what the biological and value-based thresholds are for the affected resources, ecosystem and human communities. The CEQ states that “Cumulative effects analysis necessarily involves assumptions and uncertainties, but useful information can be put on the decision making table now. Decisions must be supported by the best analysis based on the best data we have or are able to collect. Important research and monitoring programs can be identified that will improve analyses in the future, but their absence should not be used as a reason for not analyzing cumulative effects to the extent possible now” (p. 3, CEQ 1997).</p> <p>This language is tied with the CEQ’s principle of using the best analysis and the best data available in a quantitative analysis. While there is uncertainty in climate predictions, scientific analysis has revealed clear trends towards warming in Interior Alaska. Further, there is an extensive body of literature regarding the quantitative analysis of uncertainty and variability in environmental policy and decision making (e.g. Frey 1992 and onward; Morgan & Henrion 1990). Thus, within the scientific</p>	<p>methods to analyze and address these activities during the development of alternatives in the DRMP. As specified in the planning criteria, trail designations for off-highway vehicle and snowmachine use that were made in the EARMP will not be changed. Additional trail designations may be considered within the management area, consistent with the EARMP, and applicable Federal and state law. Alternatives will be considered that make distinctions between recreational ATV use and ATV use related to subsistence activities, and management options for both types of ATV use. Specific suggestions and comments related to OHV management recommendations will be considered when developing alternatives and management actions related to OHV use within the management area. The BLM will use all available data and specialists’ input to clearly quantify and disclose impacts and effects of the management actions for each alternative that is developed.</p>	

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		<p>literature there are examples of a variety of statistical methods that can be used to address uncertainty that the BLM can use in its analysis of climate change and within the context of cumulative effects should BLM’s scientists feel that the uncertainty in the scientific literature surrounding climate change is too great (Webster 2002; Roe & Baker 2007).</p> <p>Global and Regional Dynamic Ecosystem Models have been used to predict how ecosystems will respond to changes in temperature and precipitation across ranges of values (e.g. Cramer et al. 2001) as well as in combination with landuse data (e.g. Starfield & Chapin 1996). This type of analysis is not speculative, but is the best available scientific method for addressing climate change at present. The data necessary to drive these models is publicly available, including land cover data, coarse and downscaled temperature and precipitation data for Alaska. This input is critical towards modeling cumulative effects, when combined with land use data which includes development scenarios for each alternative.</p> <p>We urge BLM to incorporate the best available science, using the best available methods, in addressing climate change impacts on the ecosystems and inhabitants of the East Alaska planning area, as required by law. If there is not sufficient expertise within BLM to achieve this, we encourage BLM to seek outside assistance in order to prepare a reasonable, comprehensive assessment of climate change that will serve the purpose of conservation and sustainable management of the resources entrusted to BLM in this area. We recommend the state specific review conducted under the Alaska Climate Impact Assessment Commission, the 2008 Final Commission Report. The report clearly discusses the anticipated impacts of climate change on the state of Alaska.</p> <p>IV. Wild and Scenic River Management</p> <p>In developing and amending plans for the Delta Wild and Scenic River, BLM should explicitly disclose recreation and WSR management goals and guidelines. The tables provided on the website, for the targeted outcomes and resources, were great examples of clear and concise information. Alaska Wilderness League recommends presenting acreages, designations and decisions in table format with subsequent explanation and rationale for decisions - as often as possible, quantified information should accompany all qualifying information.</p> <p>Within the East Alaska RMP, the scenic portions of the Delta WSR corridor are closed to mineral entry (16,000 acres), the recreational portion is an avoidance area for mineral materials, and the entire Delta WSR is closed to mineral materials and leasable minerals.</p> <p>These designations are quite strong and will afford a great amount of protection to the Wild and Scenic River – however we recommend the review of strengthening the ‘avoidance area’ of the recreational portion to a closure to minerals materials as well as expanding the closure to mineral entry from 16,000 to the entire 44,000 acre SRMA and WSR planning areas. Such a review is necessary in this site specific analysis. We</p>		

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		<p>further recommend the designation of a right of way avoidance area.</p> <p>The reviews in the East Alaska RMP were cursory and general for impacts and designated uses. A closer look and the requisite ‘hard look’ are necessary, at this tiered environmental assessment. These recommendations are consistent with the goals laid out in East Alaska ROD. Page 58 of the East Alaska Record of Decision, Approved RMP, states that the primary goal of the WSR designation, X-1, is to ‘protect the outstanding remarkable values.’</p> <p>V. Off Highway Vehicle (OHV) Management</p> <p>The allowance of OHV uses in portions of the planning area requires adaptive management to prevent irreparable damage to Alaska’s changing landscapes. Education and monitoring is needed as well as clear trail designation and identification to ensure that unchecked trail widening and expansion doesn’t become an issue within the planning area.</p> <p>According to the East Alaska ROD, on page 14, trails within the Delta NWSR and SRMA would be either off limits to OHV use or restricted to existing trails. We recommend that this decision stand through this Environmental Assessment to protect and preserve the values of the land.</p> <p>‘Degraded trails are a significant environmental problem because of their direct effects on vegetation, soils and site hydrology.’ There are also associated effects on wildlife and esthetics. (Meyer, 2002)</p> <p>Alaska Wilderness League recognizes, as the BLM has in the ROD at page 15, that access is important for recreational diversity, and subsistence resources – we feel that these designations, as supported by the ROD will meet that goal and any increase in OHV uses will have negative impacts to the area.</p> <p>We recommend the study <i>Managing Degraded Off-Highway Vehicle Trails in Wet, Unstable and Sensitive Environments</i>, from USDA Forest Service written by Kevin G. Meyer. Meyer prescribes many ways to deal with and prevent trail degradation including: location documentation, condition assessment, improvement prescriptions, implementation and maintenance and monitoring.</p> <p><u>OHV Goals:</u></p> <p>Goal 1: Inventory existing and designated trails and their condition to identify the level of degradation and prioritize stabilization activities, if needed.</p> <p>Once priorities are established improvement prescriptions and implementation must be put in place. Monitoring and maintenance should be a large part of the plan.</p> <p>Goal 2: Properly document and identify designated trails and prevent the usage and proliferation of undesignated trails.</p> <p>Signs should be created and posted to designate trails and to educate the public on the importance of staying on trails, reporting degraded sites and holding others responsible for the lands we all share.</p>		

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		<p>Goal 3: Education on the impacts to soils and vegetation should be available to the public.</p> <p>Goal 4: Due to climate changes there are longer freeze and break-up periods where limitations may be necessary for both snowmachine and OHV uses to ensure that unnecessary damages are not incurred on public lands. This may include more strict weight limits, closures or visitor limitations to reduce traffic.</p> <p>VI. Wilderness Characteristics</p> <p>The amendment to the East Alaska RMP, and the Delta NWSR/SRMA plan must identify protections and means to preserve wilderness quality characteristics defined as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. We understand that current management prescribes that no wilderness designations or inventories can be made – but we consider this an ever changing administrative priority as we have seen a record of closing and opening for wilderness review and designation, in Alaska. In light of this, wilderness qualities should be documented with goals for protection to prevent degradation that would preclude future designations (BLM LUP Handbook, Appendix C).</p> <p><u>Wilderness Goals</u></p> <p>Goal 1: Document important wilderness qualities on a regional, state, national and global scale. Much of these areas have had cursory review in the previous planning processes, during implementation a more detailed analysis should be conducted to identify wilderness characteristics. Ideally, for future land managers, these areas should be clearly ranked.</p> <p>Goal 2: Offer the strongest protections possible for identified wilderness quality areas. Many of the areas have ideal management regimes under the East Alaska RMPs–closed to mineral development and closed or limited OHV use. We would like to see these areas remain closed with a focus on the identifying further wilderness quality areas.</p> <p>VII. Analysis of Impacts</p> <p>The Environmental Analysis (EA) is the site specific evaluation for impacts of management decisions, within the Delta Wild and Scenic River corridor and the Delta SRMA. The evaluation of impacts conducted in the East Alaska RMP/EIS, was short, general and conclusory. As noted in our protest dated August 2, 2006, nothing was offered in the discussion of direct, indirect or cumulative impacts that was specific, detailed or quantifiable.</p> <p>The explanation from the BLM, in regard to the statewide RMP process, is that the detailed evaluations will be conducted during the site specific implementation. As we did not see a detailed analysis in the EARMP, Alaska Wilderness League anticipates a strict adherence to the disclosure requirements of the National Environmental Policy Act.</p>		

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		<p>To best inform decision makers and reviewers the BLM must quantify impacts as much as possible and present the information in the most clear and readable way.</p> <p>VIII. Conclusion</p> <p>Alaska Wilderness League respectfully recommends strong protections for designated areas, critical habitats and important resource values. Prioritizing and protecting the sensitive areas will help preserve the character and biodiversity of the East Alaska planning area and still allow for development in suitable areas.</p> <p>As visitors, representatives, recreational enthusiasts, and concerned members of the public we have a vested interest in maintaining the remarkable values in the East Alaska planning area and the Delta National Wild Scenic River Corridor and surrounding lands, for future generations. We look forward to working with BLM to create the best management for these areas.</p>		
16	Gary Alcott Private Citizen	<p>I recently went down the Delta River. Its my favorite river the scenery is great and so is the fly fishin. When I have family & friends up we always go down the river. The marking of the portage is good. I see you had material to do something at the portage. I like the portage the way it is and wouldn't want to see it made with nice steps or to easy like the Gulkana. The Gulkana you could see a campsite far away cause the trees had no low limbs. You don't see that much on the Delta river which is good. In short the Delta river is great the way it is and the less man made stuff the better. Thanks for your letter and please keep me informed of any changes. Thanks.</p>	<p>Future facility maintenance activities and portage trail improvements will be considered in the development of alternatives in the Delta River Management Plan.</p>	<p>No change to scoping issues or planning criteria.</p>
17	Linda Rutledge Private Citizen	<p>Thanks you for allowing for "public comment" on the "scoping" phase for the Delta River Management Plan.</p> <p>Issues of importance to our family concerning the Delta River and its headwaters, the Tangle Lakes are as follows:</p> <p>Resources that are important and need protection</p> <ol style="list-style-type: none"> 1) Fish and wildlife (grayling, caribou, etc.) 2) clean water 3) natural environment that supports healthy eco-systems 4) Berries (blueberry, low bush cranberry, crowberry etc.) for animals and humans alike. 5) Natural quiet <p>Ways my family uses the area</p> <ol style="list-style-type: none"> 1) Fishing 2) Hiking/camping 3) Hunting 4) Berry picking 5) The spiritual wholeness from quite, natural, whole (healthy eco-systems without the huge 	<p>Alternatives developed in the Delta River Management Plan will consider your related issues and concerns.</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>interference of humans with their machines, vehicles and carbon footprints) that occurs. Very cosmic, but so often overlooked and truly so important.</p> <p>It is time to preserve, nurture and show stewardship towards these wonderful areas. Thank-you for the chance to comment. Please inform me on opportunities to comment. Please do not send me drafts and plan booklets as I can access them at the public library.</p>		
18	Kathryn Martin Ahtna, Inc.	<p>Tangle Lakes Zone I:</p> <p>Ahtna, Inc. would like to see Zone I be kept as a semi-primitive non-motorized place, and without any motorized OHV trails developed in the area. Foot trails should be monitored, so that the environment will be kept in its natural state. Foot trails should be kept to a minimum; if more trails were established it will only encourage more use in this area.</p> <p>Snow machines are fine during “adequate snow cover”. Motorized boating should be kept to a minimal level, especially during hunting season. We are opposed to this area being open to Recreational use during the hunting season. Recreational use should be off-limits within this area, so that Qualified Federal Subsistence Uses may have priority within this area so that they can continue to hunt without being impacted by them.</p> <p>All applicable state and federal laws regarding subsistence and cultural resource laws should be adhered to. So that Zone I will be kept in its “natural pristine state and as a free flowing water body”, and the cultural resources will be protected from harm.</p> <p>Enforcement of rules and regulations are needed to keep this area free from trash and waste and keeping the place in its beautiful natural state.</p> <p>BLM should not market any lands in the Delta River Special Management Area. Environmental education of land use should be conducted by BLM; so the public will keep the land in its natural pristine state.</p> <p>BLM should monitor this area at least 3 times per year, during the early spring, summer late fall months.</p> <p>Cooperative agreements should be developed with Ahtna, Inc. or village councils to gather oral history of the area.</p> <p>Tangle Lakes - Zone 2:</p> <p>Ahtna, Inc. would like to see Zone 2 be kept as a semi-primitive motorized place, and with motorized OHV trails be kept to a minimal level. Foot trails should be monitored, so that the environment will be kept in its natural state. BLM should discourage development of more foot trails.</p> <p>Snow machines are fine during “adequate snow cover”. Motorized boating should be kept to a minimal level, especially during hunting season. We are opposed to this</p>	<p>Your suggestions regarding Recreation Management Zones (RMZ) will be considered during the development of alternatives and management actions. Alaska National Interest Lands Conservation Act (ANILCA) Section 804 states the “...taking on public lands for nonwasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.” This priority does not apply to other uses of the public lands. Therefore, limits to public uses for the purpose of extending a Federal subsistence priority is not within the scope of this planning process.</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>area being open to Recreational use during the hunting season. Recreational use should be off-limits within this area; so that Qualified Federal Subsistence Uses may have priority within this area, so that they can continue to hunt without being impacted by them.</p> <p>Development of facilities should be kept as is; there are adequate structures in place. Building more facilities will only encourage more tourist and public within this area.</p> <p>All applicable state and federal laws regarding subsistence and cultural resource protection laws should be adhered to. So that Zone 2 will be kept in its “natural pristine state and as a free flowing water body”, and the cultural resources will be protected from harm.</p> <p>Enforcement of rules and regulations are needed to keep this area free from trash and waste and keeping the place in its beautiful natural state.</p> <p>BLM should not market any lands in the Delta River Special Management Area. Environmental education of land use should be conducted by BLM so that the public will keep the land in its natural pristine state.</p> <p>BLM should monitor this area at least 3 times per year, during the early spring, summer late fall months. The area should be kept clean of human waste and trash.</p> <p>Off highway vehicles should only be allowed on maintained trails, and the OHV trails should be kept to a minimal level to prevent rutting and erosion of the soil.</p> <p>Cooperative agreements should be developed with Ahtna, Inc. or village councils to gather oral history on this area.</p> <p>Tangle Lakes Developed - Zone 3:</p> <p>Ahtna, Inc. would like to see Zone 3 as semi-primitive as much as possible. Trails be kept to a minimal level. Foot trails should be monitored, so that the environment will be kept in its natural state. BLM should discourage development of more foot trails.</p> <p>Snow machines are fine during “adequate snow cover”. Motorized boating should be kept to a minimal level, especially during hunting season. We are opposed to this area being open to Recreational use during the hunting season. Recreational use should be off-limits within this area; so that Qualified Federal Subsistence Uses may have priority within this area, so that they can continue to hunt without being impacted by them.</p> <p>Development of facilities should be kept as is; there are adequate structures in place. Building more facilities will only encourage more tourist and public within this area.</p> <p>All applicable state and federal laws regarding subsistence and cultural resource protection laws should be adhered to. So that Zone 3 will be kept in its “natural pristine state and as a free flowing water body”, and the cultural resources will be protected from harm. Enforcement of rules and regulations are needed to keep this area free from trash and waste and keeping the place in its beautiful natural state.</p>		

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		<p>BLM should not market any lands in the Delta River Special Management Area. Environmental education of land use should be conducted by BLM so that the public will keep the land in its natural pristine state.</p> <p>BLM should monitor this area at least 3 times per year, during the early spring, summer late fall months. The area should be kept clean of human waste and trash.</p> <p>Cooperative agreements should be developed with Ahtna, Inc. or village councils to gather oral history on this area.</p> <p>Upper Delta River - Zone 4</p> <p>Ahtna, Inc. would like to see Zone 4 be kept semi-primitive, non-motorized place. Trails should be kept to a minimal level. Foot trails should be monitored, so that the environment will be kept in its natural state. BLM should discourage development of more foot trails.</p> <p>Snow machines are fine during “adequate snow cover”. Motorized boating should be kept to a minimal level, especially during hunting season. We are opposed to this area being open to Recreational use during the hunting season. Recreational use should be off-limits within this area; so that Qualified Federal Subsistence Uses may have priority within this area, so that they can continue to hunt without being impacted by them.</p> <p>No further campsites should be built by BLM in this area; since it will only encourage more public use.</p> <p>All applicable state and federal laws regarding subsistence and cultural resource protection laws should be adhered to. So that Zone 4 will be kept in its “natural pristine state and as a free flowing water body”, and the cultural resources will be protected from harm.</p> <p>Enforcement of rules and regulations are needed to keep this area free from trash and waste and keeping the place in its beautiful natural state.</p> <p>BLM should not market any lands in the Delta River Special Management Area. Environmental education of land use should be conducted by BLM so that the public will keep the land in its natural pristine state.</p> <p>BLM should monitor this area at least 3 times per year, during the early spring, summer late fall months. The area should be kept clean of human waste and trash.</p> <p>Cooperative agreements should be developed with Ahtna, Inc. or village councils to gather oral history on this area.</p> <p>Lower Delta River - Zone 5</p> <p>Ahtna, Inc. would like to see Zone 5 be kept semi-primitive; and it should be kept as a non-motorized place as much as possible. Trails should be kept to a minimal level. Foot trails should be monitored, so that the environment will be kept in its natural state. BLM should discourage development of more foot trails.</p> <p>Snow machines are fine during “adequate snow cover”. Motorized boating should</p>		

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		<p>be kept to a minimal level, especially during hunting season. We are opposed to this area being open to Recreational use during the hunting season. Recreational use should be off- limits within this area; so that Qualified Federal Subsistence Uses may have priority within this area, so that they can continue to hunt without being impacted by them.</p> <p>No further campsites should be built by BLM in this area; since it will only encourage more public use.</p> <p>All applicable state and federal laws regarding subsistence and cultural resource protection laws should be adhered to. So that Zone 5 will be kept in its “natural pristine state and as a free flowing water body”, and the cultural resources will be protected from harm.</p> <p>Enforcement of rules and regulations are needed to keep this area free from trash and waste and keeping the place in its beautiful natural state.</p> <p>BLM should not market any lands in the Delta River Special Management Area. Environmental education of land use should be conducted by BLM so that the public will keep the land in its natural pristine state.</p> <p>BLM should monitor this area at least 3 times per year, during the early spring, summer late fall months. The area should be kept clean of human waste and trash.</p> <p>Cooperative agreements should be developed with Ahtna. Inc. or village councils to gather oral history on this area.</p>		
19	Robert Angrisano Chairman of the Board Pure Nickel Inc.	<p>Per our conversation, I would like to submit the following comments for consideration.</p> <p>As you know, Pure Nickel is a large mineral claim holder in the area surrounding the section of the Delta River that the proposed Delta River Management Plan would cover. In addition, we use a camp located in the Broxson Creek area, to the west of the Delta River.</p> <p>We have invested several million dollars in mineral exploration on our State and Federal mining claims consisting of approximately 190,000 acres surrounding the Delta River and specifically adjacent to the area being covered by the Management Plan.</p> <p>We occasionally need to bring large equipment into the camp or onto our claims via 40 foot trailer that is pulled by a tractor. In the past, we have done this by starting at the Richardson Hwy and driving west over the Delta River in the winter months or in late summer when the river is very low, using an existing established road.</p> <p>In the future, assuming our exploration work is successful; we will need to continue this limited access for equipment movement and later construct an access bridge over the Delta River for year round use. This would be similar to the many bridges that are presently installed over the Delta River for pipeline access.</p> <p>ANILCA contemplated such access infrastructure and any revisions to the Delta</p>	<p>Alternatives will be developed in compliance with the Alaska National Interest Lands Conservation Act (ANILCA) Title XI and 43CFR36 pertaining to transportation, utility systems, and access in Alaska conservation system units. Subsistence uses and access to subsistence resources will be addressed consistent with ANILCA Sections 810 and 811. These alternatives will include specific criteria consistent with Title XI of ANILCA, 43CFR36 and the Wild and Scenic Rivers Act so that applications for future right-of-ways within the corridor may be reviewed relative to maintenance or enhancement of</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>River Management Plan should include such access. If the BLM believes that additional access to the river for use by the general public would be desired, we are open to that opportunity as well.</p>	<p>resource values.</p>	
20	<p>Steven C. Borell Executive Director Alaska Miners Association, Inc.</p>	<p>Thank you for the opportunity to provide scoping comments for the Delta River Management Plan. This planning unit encompasses the boundaries of the Delta National Wild and Scenic River corridor which is surrounded by significant mineral occurrences. These occurrences have been the focus of several significant mineral exploration efforts, especially by companies searching for base and precious metals such as copper, nickel and platinum group elements (PGEs). While the focus of this exploration has been outside of the planning area, access to several of the mineral occurrences has historically been across the corridor. Our primary concern is that access continue to be allowed across the Wild and Scenic River corridor for mineral related activities, as promised in and required by the enabling legislation.</p> <p>The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and work throughout the state and have an interest in planning activities that may impact mineral resource development activities.</p> <p>Please consider the following general principles and specifics during the plan development and EIS process.</p> <ol style="list-style-type: none"> 1. The Bureau of Land Management (BLM) as a multiple use agency has a responsibility to encourage jobs related to development of mineral resources. The BLM must recognize and include consideration of the important role that minerals development plays in improving the economic well-being of residents in the planning area, Alaska and the nation. 2. BLM must consider the following Federal mineral policies throughout its decision-making: <ul style="list-style-type: none"> • <u>The General Mining Law of 1872</u> as amended which states: “mineral deposits belonging to the United States,... shall be free and open to exploration...”; • <u>The Mining and Mineral Policy Act of 1970</u> that states: “ it is in the national interest to foster...mining...(and) domestic mineral resources...”; • <u>The Federal Land Policy and Management Act of 1976</u> that states: “... the public lands shall be managed...(to recognize) the nation’s need for domestic sources of minerals...”; and • <u>The National Materials and Minerals Policy Research Act of 1980</u> that states: “the continuing policy of the United States (is)...to promote an adequate and stable supply of 	<p>Alternatives will be developed in compliance with the Alaska National Interest Lands Conservation Act (ANILCA) Title XI and 43CFR36 pertaining to transportation, utility systems, and access in Alaska conservation system units. Subsistence uses and access to subsistence resources will be addressed consistent with ANILCA Sections 810 and 811. These alternatives will include specific criteria consistent with Title XI of ANILCA, 43CFR36 and the Wild and Scenic Rivers Act so that applications for future right-of-ways within the corridor may be reviewed relative to maintenance or enhancement of resource values.</p>	<p>No change to scoping issues or planning criteria.</p>

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		<p>minerals...to maintain national security, economic well-being and industrial production...”</p> <p>3. The Plan must include effective transportation provisions. Broad latitude must be included to allow development of new transportation infrastructure in the most feasible ways possible. The need exists to establish a straight-forward predictable process to develop future infrastructure. We do not know exactly where all of the mineral and energy resources are located so we cannot predict where and what types of transportation infrastructure will be needed. Surface access is a major issue across the planning area and must be treated as such.</p> <ul style="list-style-type: none"> • All roads, trails and historic access routes should be shown on all maps and identified with their BLM and/or State of Alaska identification numbers. These should include all trails, whether they qualify as RS-2477s or not. Those that do qualify as RS-2477s should be so identified. An appendix should be included to provide a comprehensive list of all trails of every type. • All 17(b) access routes should be shown on the plan with their identifying name and/number. • The plan should include and integrate the State of Alaska land selections that were established for access roads, everywhere they exist in the planning area. <p>Thank you for the opportunity to participate in this planning effort. We are always available to review ideas and concepts regarding minerals and access so if you have questions, please contact me.</p>		