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APPENDIX J: RESPONSE TO COMMENTS

A. Introduction

On April 29, 2005, a notice was published in the Federal Register announcing the availability of the East Alaska Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) (Federal Register 2005). This notice initiated the beginning of a 90-day public comment period. Comments were accepted at any point during the 90-day period and could be submitted via email, U.S. Mail, in-person, fax, or through spoken testimony. In accordance with the Alaska National Interest Land Conservation Act (ANILCA), the BLM hosted seven public meetings and subsistence hearings throughout the planning area to gather testimony on the Draft RMP/EIS and to answer questions. Additionally, at the request of the Southcentral Subsistence Regional Advisory Council, the BLM hosted a special meeting in order for the council to accept public testimony on the Draft RMP/EIS and submit formal comments. For a more complete description of the public involvement efforts see *Chapter V* and *Appendix VI*.

Approximately 4,500 comments were received on the Draft RMP/EIS during the 90-day comment period. Of these total comments, approximately 4,120 were submitted as five form letters.

This appendix contains three sections:

1. Content Analysis Process,
2. Summary of Comments by Topic, and
3. Responses to Individual Comments.

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

B. Content Analysis Process

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

Each comment was read by at least two members of the planning team to ensure that all substantive comments were identified and coded to the appropriate subject category. Non-substantive and substantive comments are defined in the BLM’s Land Use Planning Handbook: “Nonsubstantive comments are those that include opinions, assertions, and unsubstantiated claims. Substantive comments are those that reveal new information, missing information, or flawed analysis that would substantially change conclusions” (BLM 2005b: 23-24). The BLM’s National Environmental Policy Act (NEPA) Handbook further clarifies that “[c]omments which express personal preferences or opinions on the proposal do not require a response. They are summarized whenever possible and brought to the attention of the manager responsible for preparing the EIS. Although personal preferences and opinions may influence the final selection of the agency’s preferred action, they generally will not affect the analysis” (BLM 1988b: V-12). The planning team also adhered to the Council on Environmental Quality’s regulations implementing NEPA at 40 CFR 1503.4 (a) to determine which comments would be included with responses in the last section of this appendix beginning on page J-19.

Once identified by the planning team members, each substantive comment was entered into a database to allow sorting based on issue and subject. The seven main issues used to organize the EIS were also used to organize the comments, with additional categories for comments on the RMP/EIS process and general comments not falling under the seven issues. Each issue also contains numerous sub-categories to assist in grouping like comments. These substantive comments and the responses to them comprise the bulk of this appendix. Comments are included verbatim either as they were submitted in letters or email, or as they were recorded at public meetings or hearings

Many of the comments expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or represented commentary regarding resource management without any direct connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the preferred alternative, did not suggest other alternatives, or did not take issue with methods used in the Draft RMP/EIS. Where these comments expressed personal preferences or opinions, but did not require a response per BLM direction (BLM 1988b: V-12), they may be summarized below under the section,

Summary of Comments by Topic. Otherwise, non-substantive comments are not addressed further in this document. Example of non-substantive comments not further addressed include:

- "I think the following should be totally banned in this area: 1) hunting; 2) trapping; 3) new roads; 4) all two strokes vehicles of any kind; 5) mining, drilling, grazing or logging; 6) prescribed burning which pollutes the air and causes human deaths through particulates – lung cancer, heart attacks, strokes and asthma,"
- "I oppose Alternative B,"
- "I support all SRMA designations," and
- "I do not agree with the EARMP."

Form letters were analyzed in the same manner as all other comments. Each form letter was analyzed for substantive comments and coded and entered into the database, but the number of signatures on each form letter or the number of each form letter received was noted. For example, if we received a form letter from 4,000 individuals, the letter itself was coded once and any substantive comments noted in this appendix, but only one response was prepared for each substantive comment.

C. Summary of Comments by Topic

This section provides a narrative summary of public responses to issues, organized consistent with organization of Chapters II, III, and IV of the Draft EIS/RMP. Depending on the volume of comments received, summaries of comments by issue may or may not get into the detail in the second level in the outline below (e.g. you may have a general summary of Recreation comments, and, if warranted, a sub-section on Areas of Concentrated Recreation Opportunities).

Table 77. Summary of Substantive Comments Received by Issue

Issue	Number of Substantive Comments Received	Percent of Total Substantive Comments Received
Travel Management		
General Travel Management	3	**16.3%**
Transportation and Facilities	12	
OHV Management and Trails	132	
Access	32	
Recreation		
General Recreation (including tourism)	31	**8.2%**
Special Recreation Use Permits	5	
Recreation Opportunity Spectrum	4	
Areas of Concentrated Recreation Use (SRMAs)	50	

Issue	Number of Substantive Comments Received	Percent of Total Substantive Comments Received
Natural and Cultural Resources		
General Natural and Cultural Resources	6	**33.4%**
Soil	1	
Water Quality	11	
Air Quality	1	
Vegetation	2	
Fish and Wildlife	89	
Cultural Resources	12	
Paleontological Resources	0	
Visual Resources	12	
Areas of Critical Environmental Concern (ACEC, RNA)	57	
Wild and Scenic Rivers	70	
ROPs and Stipulations	82	
Climate Change	5	
Wilderness	18	
Lands and Realty		
General Lands and Realty	2	**12.1%**
Lands and Realty Program Administration	3	
Utility and Communications Corridors (PLO 5150)	86	
Slana	26	
Withdrawals	16	
Vegetation Management		
General Vegetation Management	4	**2.8%**
Lands and Realty Program Administration	5	
Utility and Communications Corridors (PLO 5150)	22	
Leasable and Locatable Minerals		
General Minerals	13	**5.5%**
Geology	1	
Mineral Occurrence, Potential, and Administration	23	
Areas open/closed to mineral entry/leasing	23	
Subsistence/Social and Economic Conditions		
General Subsistence/Social and Economic Conditions	1	**5.4%**
Subsistence (ANILCA Section 810 Analysis)	46	
Social and Economic Conditions	9	
Environmental Justice	3	

Issue	Number of Substantive Comments Received	Percent of Total Substantive Comments Received
RMP/EIS Process		
General Process	57	**13%**
Concerns with NEPA Adequacy	15	
Public Involvements and MOU Development	19	
New Alternative Proposal	28	
Maps	17	
Editorial Changes	6	
General/Other		
General (crossing multiple categories)	21	**3.3%**
Education	5	
Management of Selected Lands	10	

1. Travel Management

a) Transportation and Facilities

Most comments focused on roads. The mineral industry was supportive of new roads to access areas of high mineral potential. Others voiced opposition because of concerns over impacts to watersheds and fish and wildlife. Comments regarding facilities focused on recreational facilities along the Denali Highway. Most were supportive of new facilities to handle increased use. Some are opposed to the Denali Highway being paved.

b) OHV Management and Trails and General Travel Management

This subject received the most comments (135 responded to). Comments were split between supporting more intensive trail and OHV management and opposing more intensive OHV management or restrictions.

Generally, those supporting more intensive management expressed concern over the increasing use of OHVs on BLM-managed lands and their impacts to vegetation, soils, watersheds, water quality, subsistence resources, wildlife, fisheries, viewsheds, recreational opportunities, and quiet. Numerous commenters felt the alternatives analyzed in the Draft RMP/EIS were not balanced and did not consider enough area for non-motorized opportunities. There was strong support for consideration of a non-motorized area in the Delta Range to maintain existing primitive backcountry skiing and

mountaineering. Many comments expressed that the State's Generally Allowed Uses are not restrictive enough and that designated trails are needed, not just "existing" trails. There were concerns over increasing snowmachine use and that the Draft RMP/EIS does not adequately address this increasing use. Finally, there were concerns about vehicle size, impacts from larger OHVs, and resource damage associated with larger rigs. This group of commentors, in general, support Alternative C.

Those who were not supportive of more intensive management are concerned about access. They wish to be able to access public lands, generally without restriction. They feel Alaska is a big place and they do not acknowledge resource damage from OHVs. They state that OHVs are essential in Alaska for hunting and subsistence use, and that BLM's management needs to be consistent with ANILCA and its' allowance for access to subsistence uses, subject to reasonable regulation. They feel that snowmachines have no resource impacts. They feel strongly that implementation-level planning that considers OHV restrictions needs strong public participation. GFO received a packet of approximately 130 letters from members of the Alaska Access Alliance. These letters were similar and expressed a desire for BLM to adopt alternative A (No Action), but that alternative A should be modified to include the State's Generally Allowed Uses policy for OHVs. These letters also stated that OHV management of State-selected lands needs to be consistent with State policy. These sentiments were also reflected in comments from Alaska Outdoor Council.

In general, there was some support for trail hardening and maintenance but also concern that these activities would bring more use and that trails should be "left alone". Ahtna, Inc. and the EPA strongly support more intensive management of OHVs. The State of Alaska wants to ensure access (particularly to resource development), is supportive of implementation level planning, and will not support OHV limitations based on "impacts to the viewshed, maintaining a diversity of recreational opportunities, or any snowmachine restrictions based on trail densities."

c) Access (17b easements, R.S. 2477s)

Many of the comments received on this subject came from public testimony, particularly from Ahtna shareholders. Concerns expressed include: 1) trespass onto private lands as a result of 17(b) easement use; 2) resource impacts (including soils, water quality, fisheries, cultural, and subsistence resources) on private lands and on the easements themselves; 3) perceived lack of management on BLM's part, particularly in law enforcement. There were also numerous comments about the need for cooperative agreements and for BLM to work with Ahtna on developing a plan for management of 17(b) easements.

2. Recreation

a) General Recreation, Special Recreation Permits, and Recreation Opportunity Spectrum

Many comments on general recreation focused on management of the Denali Highway. In general, the sentiment is to keep it the way it is, to maintain a diversity of opportunities there, to maintain or build a few (limited) facilities to handle increasing use, and to not pave the highway. There is some concern over potential mineral development north of the Denali Highway (on State land) and its impacts on recreation. The National Park Service would support a cooperative visitor's center in the Cantwell area. Other general recreation comments included a concern over increasing helicopter-supported commercial recreation activities and potential impacts to subsistence from recreation activities.

b) Areas of Concentrated Recreation Opportunities (SRMAs)

Comments were split in support and opposition of SRMAs and how they should be managed. Most supporting SRMAs would like to see an emphasis on non-motorized recreation and opportunities for primitive recreation maintained. Some feel the Draft RMP/EIS is not balanced and does not consider enough non-motorized areas. There is support for the Denali Highway managed as an SRMA and a strong sentiment to manage it as is. Some commentors supported a Backcountry Byway designation, while Ahtna, Inc. opposed both the Backcountry Byway designation and an SRMA along the Denali because of concerns about recreation impacts on subsistence.

Those in opposition felt that SRMAs would restrict access or mineral development. They also feel that SRMA designations are inappropriate on State or ANCSA selected lands. The State of Alaska is opposed to any non-motorized areas designated through this RMP.

3. Natural and Cultural Resources

a) General Natural and Cultural Resources, Soils, Water Quality, Air Quality, and Vegetation.

Most comments focused on water quality. There is support for increased water quality monitoring and concern for water quality impacts from OHV use, potential mining, and

recreation activities. The mineral industry pointed out that strict water quality standards are applied to miners.

b) Fish and Wildlife (including Sensitive Status Species)

Wildlife: Most comments focused on the need to protect habitat for hunting and for subsistence activities. There were several comments regarding the need for protection of migratory birds. There were comments that expressed concern about the amount of land being made available for potential mineral development and impacts to wildlife habitat from mineral development. Finally, there were several editorial comments about wildlife range maps or non-coverage of certain species.

The State of Alaska encouraged continued local consultation and cooperation with ADF&G. They also will not support OHV restrictions based on wildlife habitat concerns, but encourage consultation with the State on implementation-level planning.

Fisheries: Several commentors felt the analysis of impacts to fisheries was inadequate. They felt coverage of fisheries was inadequate due to the economic, subsistence, environmental, and social significance of the Copper River salmon. They encouraged consideration of a Copper River ACEC. There were comments about OHV impacts to fisheries habitat. The Yakutat borough opposes opening the eastern 1/3 of Bering Glacier to mineral entry or leasing, based on concerns about potential mining impacts to fisheries. The State's comments emphasized that ADF&G manages populations and that there is very little evidence of habitat degradation in the planning area.

c) Cultural and Paleontological Resources

Most comments focused on the need to continue inventory of cultural sites and provide protection. There is concern, particularly from Ahtna shareholders, regarding impacts to cultural resources from OHV use, 17(b) easements, and recreation. Comments on paleontological resources focused on our lack of inventory.

d) Visual Resources (VRM)

Most commentors suggested that the Draft RMP/EIS should consider more Class I and II areas and less Class III and IV areas.

e) Areas of Critical Environmental Concern (ACEC)

Most commentors supported alternative C and its designation of ACECs and the Bering Glacier RNA. Support focused on protection of resource values, including caribou and bison habitat, trumpeter swan nesting habitat, and the unique ecological communities associated with the Bering. Some commentors felt that protective measures identified in the ACECs were not strong enough, even in alternative C. Support for the Nelchina caribou calving ACEC and West Fork ACEC included the Southcentral Regional council and the EPA. The State of Alaska supported these areas in concept but some implementation-level considerations were problematic.

Opposition to ACECs came from Alaska Miners Association and the Alaska Outdoor Council because of perceived restrictions to access or to mineral development. They also felt that such designation on State or ANCSA selected lands is inappropriate.

Support is almost unanimous for the Bering RNA, though most commentors preferred alternative C. EPA, the National Park Service, and Yakutat borough are all opposed to the lifting of PLO 5179 in the eastern 1/3 of the Bering under the preferred alternative.

f) Wild and Scenic Rivers

This topic generated a lot of comments (70 substantive). Most comments were supportive of Wild and Scenic River designation and management. Some comments questioned the adequacy of our eligibility and suitability determinations, as presented in the Draft RMP/EIS. Others suggested additional rivers that did not appear on the list of eligible rivers presented in the Draft RMP/EIS. Other comments stated that we failed to consider protective measures for eligible rivers and that we failed to consider a range of alternatives for suitability. Finally, there were several comments that suggested deferring suitability determinations until State and ANCSA entitlements are met and land status is stable.

Opposition to Wild and Scenic River designation came from Alaska Miners Association and the State of Alaska. AMA also opposed protective measures in existing Wild and Scenic River corridors (the Delta and Gulkana).

g) ROPs and Stips

This topic also generated a lot of substantive comments (82). Most comments, though, were submitted by two groups (Alaska Coalition and Cascadia Wildlands). In general, these comments suggested the ROPs and stipulations should be more prescriptive and leave less opportunity for exceptions, waivers, or modifications. Several comments questioned the adequacy of specific buffer distances. They asked for justification for

those distances. There were also questions about enforcement of the ROPs and stipulations. Environmental Protection Agency (EPA) felt that ROPs and stipulations should be more prescriptive and that justification for buffer distances should be provided in each ROP or stipulation, where applicable.

There were no comments from industry.

h) Climate Change

All commentors felt that the Draft RMP/EIS did an inadequate job of considering climate change and its potential effects in the planning area.

i) Wilderness

Eighteen substantive comments were received, all questioning the lack of wilderness inventory and consideration in the Draft RMP/EIS. They also question the legality of the Secretary's directive regarding wilderness inventory and consideration in land use planning in Alaska. There was particular interest in the Bering Glacier area.

4. Lands and Realty

a) General Lands and Realty and Lands and Realty Programs and Administration

Very few comments received in these categories. The State requests consistency with ANILCA in permitting temporary shelters on public lands.

b) Transportation and Utility Corridors (PLO 5150)

This topic generated many comments (86 substantive), mostly generated through the seven public hearings that were held in Fairbanks, Anchorage, Delta Junction, Chistochina, Glennallen, Valdez, and Cordova. Spoken testimony was also received at a special Southcentral Advisory Council meeting held at Kluti Kaah hall (Copper Center). These meetings were held consistent with ANILCA, section 810, in response to the Draft RMP/EIS section 810 analysis finding that revocation of PLO 5150 and subsequent transfer to the State of Alaska would have a significant impact on subsistence (this is proposed in Alternative B, not the preferred alternative). They are

considered under Lands and Realty, though most of the comments received were related to impacts to subsistence.

The substantive comments recorded in this Appendix do not reflect the emotion and total volume of comments generated at the public hearings, particularly those in Glennallen, Chistochina, and Kluti Kaah. Many comments received were not considered substantive because they were stated as general statements of opposition without supporting justification or they were statements about issues that are out of the scope of the decisions made in this RMP. However, because of the volume received and the nature of the testimony, some of those comments are summarized here:

- Trespass and competition on Native lands have resulted in fewer opportunities for subsistence activities.
- Increased use of trails (including 17(b) trails), and particularly large rigs using trails, is resulting in impacts that directly or indirectly effect subsistence resources.
- The State's Tier II subsistence permit system is not user-friendly and permits are hard to get, particularly for younger people.
- Subsistence is about sharing and other activities besides hunting.
- Ahtna people do not waste subsistence resources. They use it all.
- OHVs make hunting harder for those without one.
- Caribou are waiting longer to cross through pipeline/utility corridor area because of Tier II hunting pressure. The Federal hunt allows longer season and needs to be maintained.
- Elders can hunt in the pipeline/utility corridor because of easy access and ability to take any bull moose.

Almost all substantive comments received opposed the revocation of PLO 5150 and subsequent transfer to the State of Alaska. Reasons for opposition focused on federal management of the area as a subsistence hunting unit, but there was also concern expressed about recreation management and federal oversight of the pipeline if the pipeline/utility corridor was transferred to the State. Resolutions opposing the revocation were received by Ahtna, Inc., local tribal governments, and the Southcentral and Southeastern Advisory Councils. Environmental Protection Agency and the National Park Service also opposed the action.

Those in favor of the revocation of PLO 5150 were Alaska Miner's Association, Alaska Outdoor Council, and the State of Alaska.

c) Slana

Most commentors voiced opposition to disposal of lands in the Slana area on a large scale, competitive bid basis. Reasons for opposition included: 1) The need for BLM to focus its management efforts on cleaning up the unauthorized use and associated

resource impacts from the 80's settlement in the area; 2) lack of infrastructure in the area to support more people; 3) lack of resources in the area, leading to competition for those already there; and 4) resource impacts that have occurred and are still occurring as a result of settlement in the area. Opposition was voiced by Mentasta village, Chistochina, and Ahtna, Inc. as well as Slana residents. There was some support for using selective disposal for cleaning up unauthorized use.

d) Withdrawals

Those opposed to the revocation of ANCSA d(1) withdrawals cite the need to retain protective measures, particularly against mineral development. There were some comments that expressed confusion over the purpose of the ANCSA d(1) withdrawals and the effects that revoking them would have. There was also some question of the relationship between decisions made in this RMP and the State-wide ANCSA d(1) withdrawal review.

The State of Alaska and Alaska Miners Association both strongly oppose retention of ANCSA d(1) withdrawals.

5. Vegetation Management

a) General Vegetation Management and Forestry Practices

In general, there is local support for habitat improvement, particularly for moose habitat, through prescribed burning. Most commentors supported small-scale commercial sales to support local demand, and comments supported providing areas for personal firewood gathering. There were concerns expressed about impacts from commercial timber sales and questions about clarity of the proposed scale of commercial sales being proposed in the Draft RMP/EIS.

b) Fire Management

Few substantive comments.

6. Minerals

a) General Minerals, Geology, and Minerals Occurrence, Potential, and Administration

Alaska Miners Association asked for more detail in mineral potential and in discussion of major exploration projects in the area. Many other comments opposed the opening of 80% of the area in the preferred alternative through removal of ANCSA d(1) withdrawals in the preferred alternative. There are comments about concerns over mineral development impacts on water quality, soils, wildlife habitat, fisheries, and recreation, particularly in the Tangle Lakes area.

Some commentors felt that the analysis presented in the Draft RMP/EIS did an inadequate job of considering impacts from mineral development. Others questioned how determinations were made on which areas to make open to mineral development. There were a couple of comments about the perceived lack of coverage in the Draft RMP/EIS of coalbed methane development and coal.

d) Areas proposed as open or closed to mineral development

Most commentors were opposed to the opening of 80% of the area to mineral development in the preferred alternative. Some commentors felt that the range of alternatives is inadequate in consideration of this issue (there should be more area closed in Alternative C). Some commentors questioned the adequacy of the impacts analysis relative to mineral development.

7. Subsistence/Social and Economic Conditions

a) Subsistence, ANILCA 810 Analysis

This analysis generated numerous substantive comments (46). Several commentors (including the State of Alaska) felt that the background information, presented in Chapter III, on subsistence activities, resources, and use patterns was inadequate. Some commentors also felt the Chapter IV analysis and 810 Analysis were inadequate and did not do a thorough enough job in portraying impacts to subsistence from mineral development, other resource development activities, and OHV use. There were several editorial comments, including from the State of Alaska. The State suggested re-wording

to clarify federal/State roles in subsistence management and questioned the future federal role in subsistence management.

Alaska Outdoor Council pointed out that the local ADF&G biologists have cited no specific or significant impacts to subsistence resources as a result of OHV use in the area.

Numerous comments were gathered through spoken testimony on the issue of subsistence and the role that it plays in the lives of Alaska Natives and rural Alaska residents. Although many of these comments were not substantive, their content depicts the importance of the Federal Subsistence Program in the daily lives of those it serves. Excerpts representative of these testimonies are included below.

- "A lot of people in the area, in the Copper River Basin, for years, have not gotten a hunting permit under the [State of Alaska] Tier II system, but a lot of urban people do. So we know that that's kind of working against the local subsistence hunting." (BLM 2005d)
- "[I] know like a lot of other people, like a lot of other youths in my life, it's something that they learned how to survive on. And the elders, they teach us youth to survive on hunting and berry picking . . . [W]e survive on hunting and this [revocation of PLO 5150] will just like kind of destroy our tradition[.]" (BLM 2005d)
- "[T]heir [State of Alaska's] season closed on September 20th, and every years it seems like the last three years, I know, they [caribou] migrate through there after that season. So people from the local areas using this rural preference get permit to hunt caribou there." (BLM 2005d)
- "I know that predominately a lot of locals in that time do take animals and, you know, in our culture is that most of the young people share those animals with the elders. They bring them in and share the, . So it will have a huge impact in these villages if that 5150 is revoked." (BLM 2005d)

b) Social and Economic Conditions and Environmental Justice

Few comments were received here (12 substantive). Most economic comments focused on the lack of economic information presented in the Draft RMP/EIS on Copper River salmon, particularly commercial fisheries. Alaska Miners Association asked for more discussion and analysis of the economic benefits of mineral development.

8. RMP/EIS Process

a) General Process

These comments covered a wide variety of topics. Several commentors felt strongly that BLM needs more money in order to carry out its management intent, particularly in monitoring and inventory and in enforcement. Several commentors stated that if PLO 5150 is revoked (as is proposed in Alternative B) that new analysis would be needed to consider impacts to recreation in particular. There were questions about implementation level planning—how it would be prioritized and how much public involvement would occur. The Alaska Outdoor Council and members of the Alaska Access Alliance stated that this planning effort should be deferred until State and ANCSA entitlements are met. They also felt that State-selected lands should not be included in this planning effort. A couple commentors (including EPA) expressed concern about the public's ability to comment on the plan with GFO's website down.

b) Concerns with NEPA adequacy

The following comments were included:

- There was inadequate consideration of critical elements.
- The cumulative impacts analysis is inadequate. Specific omissions were noted.
- A full range of alternatives was not considered. The feeling is that Alternative C does not represent a true "conservation" alternative.
- No alternatives were considered on several issues, including Wild and Scenic Rivers, consideration of a Copper River ACEC, wilderness, and others.
- A watershed approach should be utilized, particularly for cumulative effects.

c) Public Involvement including MOU development

Nineteen substantive comments were received on this topic. There were numerous comments from Ahtna and Ahtna shareholders about the desire to work with BLM on cooperative agreements covering many facets of implementation of the plan. A couple commentors felt that the review period on the Draft RMP/EIS was too short. Some felt that there could have been better notification prior to public meetings. Several Ahtna shareholders emphasized the need to tribal entities to be referred to on a government-to-government basis. EPA recommends a description of public outreach efforts and a description of how public comments were used in the planning process.

d) New Alternative Proposals

Alaska Outdoor Council and Alaska Access Alliance commented that Alternative A should be amended to include the State's Generally Allowed Uses relative to OHV management. There were several comments asking for consideration of a Copper River ACEC. And several commentors asked for the addition of the McCallum Creek drainage for consideration as a non-motorized use area.

e) Maps

Ahtna Inc. and several Ahtna shareholders requested removal of R.S. 2477 routes as depicted on the trail map in the Draft RMP/EIS. Other commentors asked for more detail on maps and for specific items to be included on maps.

9. General/Other

a) General (crossing multiple categories)

These comments covered various topics. Most commented on the Draft RMP/EIS coverage (or perceived lack of coverage) of navigable waters and Native allotments.

b) Education

All comments were supportive of more education, particularly related to 17(b) easements.

c) Management of Selected Lands

Most commentors felt that BLM should take a more proactive role in management of selected lands, while Alaska Miners Association and Alaska Outdoor Council feel that proactive management of selected lands by BLM is inappropriate.

D. Response to Individual Comments

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

1. TRAVEL MANAGEMENT

Letter # - Comment #	Comment	Response
GENERAL TRAVEL MANAGEMENT		
0164-20	Separate out references to "selected" lands into Native-selected and State-selected as we have different views on the management of OHVs on these lands.	Although the State of Alaska and native groups have differing views on the management of OHVs, BLM's management of OHVs on selected lands is the same regardless of the selecting entity. Both the State and native groups have the opportunity to work with the BLM to more actively manage OHV use on lands they have selected. Because the management actions described are the same regardless of the selecting entity, it is logical to reference all "selected" lands as one category when referring to OHV management. Travel Management Areas that are predominantly Native-selected land (Chistochina-Cantwell Area described in the Draft RMP/EIS in pages 40 and 47) have different implementation-level decisions than those predominantly State-selected.
0310-1	Alternative "A" is the best alternative since it does not impose additional restrictions on access. I support this alternative revised so that it matches the State of Alaska's "Generally Allowed Uses on State Land" policy.	Alternatives C and D analyze the effects of adopting criteria consistent with "Generally Allowed Uses on State Land" (11 AAC 96.020 and 11 AAC 96.025) for interim management of OHVs on State- and Native-selected lands. Alternative A (the No Action Alternative) is presented in the document to consider the effects of managing under a predominantly "open" OHV designation. We will not revise Alternative A in the Proposed RMP/Final EIS but could consider a combination of Alternatives A and D in the final decision.
0385-2	Another thing, you know, I was concerned about is the need to monitor vehicles and traffic, you know, in the streams, in our streams, especially I'm thinking of Chitina areas and the habitat in our whole area, you know.	The Draft RMP/EIS, page 33 describes Inventory and Monitoring Common to All Action Alternatives and states that "inventory and assessment will continue...to identify all existing trails and assess trail density and resource impacts."

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TRANSPORTATION AND FACILITIES		
0010-8	I'm concerned about any construction of road in new areas or access without first talking about trespass issue and the affect on wildlife and fish.	Alternatives considered in the Draft RMP/EIS consider a different range of areas that would be excluded from consideration for issuance of rights-of-way, based on specific resource concerns. These are presented in the Draft RMP/EIS on pages 107-109. Potential effects of road construction on soils, water quality, and vegetation are discussed in the Draft RMP/EIS on pages 399, 402, 410, 414, 425, and 427. Required Operating Procedures developed to mitigate impacts in areas where roads would be permitted are described in the Draft RMP/EIS on pages 610-621. Consideration of potential trespass needs to be considered in consultation during implementation level planning.
0044-1	On many maps, the area where "my" land (USS 4339) is located, east of the Susitna River bridge and above Susitna Lodge, seems to have many designations. Am I correct to assume that it has no planned transportation restrictions and is planned to be open to a variety of mining options? If so, can a land "owner" like myself request a buffer zone around the private property to avoid conflicts with other land use? The reason I enjoy being on USS 4339 is its quietness and remoteness from major development.	The area around your private land is State-selected. For OHV management, Alternative C would limit OHVs to designated trails, while Alternative D would encourage OHV users to utilize existing trails while lands are selected, and would designate trails if lands are retained in Federal ownership. Under Alternatives A and B no OHV restrictions would apply. Alternative C would maintain withdrawals to prevent mineral development, while Alternatives B and D would allow mineral development if lands are retained in federal ownership, subject to Required Operating Procedures described in the Draft RMP/EIS on pages 610-626. No buffer zones around private lands are considered.
0044-18	The Denali highway corridor does have many existing pull-outs already degraded. It makes sense to develop those with trash dumpsters (bear proof of course) or, at least, signs regarding proper disposal and storage of food and trash, and other traveler services.	The Draft RMP/EIS, pages 57,59, and 62, considers a range of alternatives for facility development along the Denali Highway.
0044-20	The Denali Highway will retain its quality experience by remaining gravel. It might last longer if the size of vehicles - tractor trailers and tour buses - could be restricted or pay for road use.	The Denali Highway is a State Highway maintained by Alaska Department of Transportation. The decision of whether or not to pave the Denali Highway is ultimately a State decision.

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0057-3	They talk about the right-of-way applications and it's part of the process, however, there's a certain amount of responsibility of BLM to see that these off-road -- or these roads going to these public lands are accessible safely. Besides my homestead area that I'm primarily concerned with, there's another recreational, Little Tok Drainage area, and they need a road that goes in where people could park and take off on trails, either by foot or by ATV at a certain point, but they need a proper access on some of these trails to get to see these resources. And it's not exploiting the resources when they have these roads, but it's actually going to add to protecting the resources, such as law enforcement, such as fire protection and public services.	Applications for rights-of-way would continue to be processed by the Glennallen Field Office, under any alternative. Alternatives considered in the Draft RMP/EIS on pages 107-109 consider a different range of areas that would be excluded from consideration for issuance of rights-of-way, based on specific resource concerns. The Slana area as an exclusion area for right-of-way issuance is not considered under any alternative.
0164-18	Road Construction - Ahtna Inc. requires consultation regarding the development of roads that would have an impact on our lands and resources.	Please see response to comment 0010-8.
0169-1	The populations of South Central Alaska is increasing. This increase will need recreational development to meet its needs. This development should consist of new trails and improvements to existing trails. Without new development, we only have saturation of existing facilities.	In the Draft RMP/EIS under Implementation-level Considerations, pages 42-48, Alternatives A and B allow new trails to develop with increased use. Alternative D considers new trail construction in specific travel management areas, consistent with objectives.

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0173-5	The BLM should work in partnership with the Mineral Exploration Industry to identify new roads that would provide the BLM with better fire fighting, access, recreation and hunters with better back country access and mineral explorers with access to identified mineral occurrences. Mineral Exploration companies are willing to spend money to create roads that can be used by all residents of the State. However, we would like to work closer with the local governing authorities to assure the placement of the roads will benefit all users.	Alternative B anticipates an increase in road construction and considers effects (including positive effects) of such an increase. Alternative D also anticipates slight increase in road construction. Partnerships, coordination, and consultation related to road-building, mitigating impacts, and providing benefits, would be considered during implementation-level planning.
0175-3	For all management areas with alternatives including “Construction of new roads” and “Rights of Way,” and for Issue 1, Travel Management, we request recognition of valid existing rights either in the table or as a footnote. In addition, for conservation system units (CSUs) under ANILCA (Gulkana SRMA and Delta SRMA), the alternatives for the above mentioned categories should recognize the provisions under Title XI of ANILCA. Specifically, Title XI includes the option of considering future transportation and utility systems across CSUs.	The Draft RMP/EIS has been changed to recognize valid existing rights. These include the following sections and pages within the Proposed RMP/Final EIS: alternative descriptions for the Gulkana WSR Corridor and Delta WSR Corridor Travel Management Areas on pages 43, 45, 47, 51, and 53; Table 3 on page 58; and discussion of right-of-way exclusion areas on 122.
0175-23	Page 49, Travel management summary. We request the preferred alternative include the development of more facilities for recreational use, including increased trail development and improvements and waste management facilities, in order to help keep public lands clean. A proposal to develop these facilities is only included under Alternative B.	As mentioned in your comment, increased facilities to handle impacts are considered in Alternative B. However, Alternative D also considers increasing recreational facilities along the Denali Highway over existing levels to facilitate increasing visitor use. Alternative D also considers new trail construction in specific travel management areas, consistent with objectives. This information is presented in the Draft RMP/EIS under Implementation-level Considerations on pages 42-48.

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0329-35	Road building would cause significant negative impacts to watersheds. Subgrade roads in particular cause substantial damage. Please do not permit them.	Alternative C considers 3,270,000 acres where no new road construction would be permitted. Alternative D also considers some areas closed to new road construction, based on specific resource protection. Potential effects of road construction on soils, water quality, and vegetation are discussed in the Draft RMP/EIS on pages 399, 402, 410, 414, 425, and 427. Required Operating Procedures developed to mitigate impacts in areas where roads would be permitted are described in the Draft RMP/EIS on pages 610-621.
0329-188	Please use quantitative statistics in the Travel Management section. How many miles of what kinds of roads are there? What is a "moderate" amount of road construction? (p.377) What is a "slight" increase in road construction? (p.421) The Draft EIS says cumulative impacts from continued OHV trail proliferation would be "minor to insignificant," (p.539) while the Management Situation Analysis says it is an "extreme concern." What do these words mean?	Miles of existing roads have been added, see the Proposed RMP/Final EIS Table 14 page 184. The terms "moderate" and "slight" were used because these are predicted amounts based on lands available for potential development. We have quantified these terms in the Proposed RMP/Final EIS on pages 414 and 415 as well quantified why the expected effect would be "minor to insignificant" in the Proposed RMP/Final EIS.
OHV MANAGEMENT AND TRAILS		
0006-2	I strongly believe that non-snow ORV use should occur not on all existing trails, but on designated trails only. Many existing trails are unplanned, social trails and are in inappropriate locations with regard to soils, vegetation, hydrology, fisheries, wildlife, scenic vistas, wilderness, social conflicts, etc. BLM should review its inventory of existing trails and designate for continuing use only those that are appropriately located; that may be a relatively small number of the presently "existing" trails. This makes sense from both a resource and an enforcement perspective. How will BLM prevent the proliferation of "existing" trails, and how will it prove that a rider on a trail created after the plan is implemented knew that, although the trail existed on the ground, it was in fact an illegal post-plan trail?	OHV management decisions described under Alternative D (the Preferred Alternative) would set the stage for taking the actions you describe, particularly on lands managed long-term by the BLM. It does this by designating the majority of lands as "limited" to OHVs, which gives us numerous options for management, based on on-going site-specific trail inventory and assessment and public input during implementation-level planning within the next five years.

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0006-3	Even Alternative C provides an inadequate number of areas where only non-motorized recreational use is allowed. Balance and fairness require that additional non-motorized areas be designated (under Alternative C, the most protective alternative, only 4% of the area is closed to summer motorized use, and 3% to winter motorized use; this is hardly balanced, and of course the preferred alternative is even less fair); people are not locked out of such areas--machines, not people, would be prohibited.	BLM feels that a balance in recreational experiences and a mix of motorized and non-motorized opportunities can be achieved in many areas without regulation, by maintaining existing primitive recreation opportunities. Current Recreation Opportunity Spectrum inventory shows that 63% of BLM-managed lands offer a primitive recreation experience as shown in the Draft RMP/EIS on page 174.
0006-4	Although the ecological impacts of snowmachine use are less obvious than those of summer use, they are not non-existent. Clean air and water are affected, wildlife can be stressed, travel where there is inadequate frost and snow cover can harm vegetation and soils, and scenic snowscapes can be degraded by large mazes of vehicle tracks for as far as the eye can see.	BLM acknowledges possible snowmachine impacts in the Draft RMP/EIS on page 171. BLM allows for possible snowmachine regulation in implementation considerations for specific areas in Alternatives C and D, based on specific resource concerns in the Draft RMP/EIS on pages 33-50.
0006-5	Providing quiet areas in all seasons, and providing high quality opportunities for non-motorized recreation (where both uses are allowed, motorized use, which is incompatible with quiet use, becomes dominant and displaces the vast majority of quiet users, or at best provides only a low quality opportunity), enhances both mental and physical health.	Thanks for the comment. The Draft RMP/EIS considers alternatives that designated up to 281,000 acres as non-motorized (see Draft RMP/EIS, Alternative C, page 49). In addition, described management objectives for recreation under Alternatives C and D (Draft RMP/EIS, pages 58-64) maintain primitive recreation opportunities over as much as 63% of the BLM-managed lands in the planning area. This represents a large area where, at the least, motorized encounters are rare or limited to established trails, even in the winter.
0006-7	Jet skis should be prohibited in most locations. They are nothing but thrillcraft, almost entirely used for non-functional purposes, excessively noisy, unusually irritating because of the frequent change of pitch, and harmful to fish and wildlife when they invade riparian areas.	While this may be a consideration in some implementation-level plans, the decision, on any navigable waterways, ultimately lies with the State of Alaska.

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0006-8	Where airboats (which are incredibly loud) can be used should be strictly limited. For most purposes, other motorized, less noisy and intrusive craft (let alone non-motorized boats) are entirely adequate alternatives to airboats. Some argue that airboats are necessary in some places during the hunting season; if this is in fact the case in some locations; such use should be limited to the hunting season.	Use of airboats has been and will continue to be considered in implementation level planning (Delta and Gulkana rivers, for example). However, the ultimate decision on whether or not to allow airboat use on navigable waterways belongs to the State of Alaska.
0006-10	The State of Alaska does an abysmal job of managing motorized recreation on general lands; the results are land and resource degradation and user conflicts. BLM, by deciding to be a responsible manager of motorized recreation, could be a model for the State and could create an alternative, responsible scheme for the management of this use in the region. If quiet, relatively unspoiled lands are not going to be found on state lands, at least the BLM can provide them.	BLM's goal, as stated in the Draft RMP/EIS on page 55, is to manage to maintain a diversity of recreation opportunities. Certainly a key to managing for a primitive recreation experience is the management of motorized use. By taking the management direction indicated in Alternative D (the Preferred Alternative), BLM sets the stage to proactively manage to maintain a range of recreation experiences, particularly on lands managed long-term by the BLM. In some cases this can be done in a non-regulatory fashion by controlling un-managed proliferation of motorized trails. In other cases, particularly where use trends are increasing, some regulation may be required.
0006-13	In addition to other provisions, C makes the Tangle Lakes, one of the gems of the planning area, one of the few waters in the region that would be free from the noise and pollution of motorized watercraft.	Under Alternative C, BLM would recommend to the State that no motorized watercraft be permitted on Tangle Lakes. This wording has been changed in the Proposed RMP/Final EIS on pages 68, 71, and 495. This is a management action that would be consistent with objectives for the area described under Alternatives C and D and would be considered in implementation-level planning, subject to coordination with the State and Native Corporations and public involvement.
0006-17	You say that you desire to maintain a diversity of recreational opportunities. I think actually that you need to restore some non-motorized recreation opportunities, there are very few of them any longer, of high quality, on BLM's lands.	We disagree. Our Recreation Opportunity Spectrum inventory indicates 4,787,000 acres that currently provide a primitive recreation experience, where exposure to motorized use is rare to non-existent. While this may decrease somewhat during the winter season, snowmachine use in much of the Copper Basin is limited to winter trails due to heavy vegetation.

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0006-19	I think you need to do some management in the wintertime also, and not just on heli-skiing, but also snowmachine use and, again, there should be some areas that are closed to both snowmachine use and heli-skiing use for both recreationists and to protect wildlife who are stressed in the winter and are seeking some refuges where they're not going to be, you know, driven into more restricted areas or habitat.	By designating most BLM-managed lands under a "limited" OHV class, the Preferred Alternative sets the stage to do some snowmachine management in implementation-level planning. In addition, Alternative C would close 281,000 acres to snowmachine use, except for access for subsistence hunting.
0016-2	I think like some of these roads they shouldn't be out there in May because they just tear it up is what they do and it's just soft, and I think they should close it for about three weeks in the spring.	Specific seasonal closures will be considered in implementation-level planning, as indicated in the Draft RMP/EIS on pages 33-50.
0017-2	Another thing I'd like to talk about, which hasn't been mentioned too much tonight, is how you propose to manage both ATVs and off-road vehicles, big CAT rigs and six-wheelers. Right now, if we were to go with Alternative A, nothing would change and you wouldn't be able to limit some of that use that's causing a lot of trail damage up in the Talkeetna's. At the meeting in Chistochina earlier, I went to listen to concerns, and folks are really concerned with both ATV and off-road vehicle damage, so I would suggest that you go with the alternative that gives you some tools to manage that, and that would be C. In there you've proposed these special recreational management areas, five of them, and that's great. I mean I really think that should be in the preferred, in the final, I think you should go with that. That will give you tools, people can be involved. It will affect both Native and State selected lands, and I think that's the position that would make you a good land steward for the interim, for those selected lands.	Thank you for the comment. We agree that both Alternatives C and D give BLM the most management options for management of OHVs in future implementation.

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0020-17	The limited and closed areas proposed for the off-road vehicles, we just don't want those big rigs up there. We watch big rigs, mud-boggers, you know, whatever they call them, go across our trails and destroy our fish, but they're also destroying our--how we feel about ourselves. We can't protect our lands, do you know what that does? If it was your land that you couldn't protect for your children and grandchildren, and you feel this sense of hopelessness. So I'd like to have those reworded to where we're starting to protect our resource values.	Please see response to comment 0164-17 regarding weight limitations.
0020-22	We need reparation on our trails. Some of those trails are a mile wide. I read your report, you gave it up to 100 feet, I'm talking a mile wide that they've destroyed our lands, destroyed the watersheds, destroyed the ground, the vegetation. You have lofty goals but you know what that land's being destroyed, so you need multi-billion dollar budgets to repair them now.	The Draft RMP/EIS on page 168 acknowledges that trail braiding is occurring and the impacts to soils, vegetation, and water quality. The documented resource impacts that are occurring drive the need for BLM to propose changing OHV management from the status quo to a more proactive role in trail and OHV management. These proposed changes are discussed and analyzed under Alternatives C and D in the Draft RMP/EIS. We agree that an increased operating budget will be necessary to implement even a portion of the needed trail maintenance.
0020-23	Many of the existing trails are currently illegal and not enforced. So some of the regulations you're wanting to keep status quo, you cannot keep an illegal trail status quo, that's not acceptable.	The only "illegal" trails that currently exist on BLM-managed lands are unauthorized trails within the Tangle Lakes Archeological District. Otherwise, all BLM managed lands within the planning area (except the Gulkana and Delta river corridors) are currently open and cross-country travel is permitted. Adopting the Preferred Alternative (Alternative D) of the Draft RMP/EIS would change this situation by designating most areas as limited to OHVs.
0022-2	[W]hen you talk about restricted use for off-road vehicles, why don't we include aircraft when we talk about this?	The Federal Aviation Administration (FAA) regulates aircraft. However, BLM is involved in aircraft landing areas, particularly in permitted or commercial uses, such as heli-skiing. There are specific proposals for regulation of helicopter-supported activities within the Draft RMP/EIS on pages 59, 63, 83, and 85.
0026-3	One alternative I would like to see is only limited to ATV use only on the trails because a lot of our trails have been damaged by a lot of these vehicles and track rigs.	Under Alternatives C and D, most areas would be managed under a "limited" designation, where trails would be designated or OHVs would be encouraged to use existing trails. Specific trail designations or other limitations would occur during implementation-level planning.

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0027-1	So the big thing is the management of trails and working with the communities and the villages, with those, to come up with a plan that will work for everyone and not just target certain populations.	This is clearly BLM's intent under Alternatives C and D. See Draft RMP/EIS, pages 40 and 47, for the Chistochina-Cantwell Area, where it is stated, "Where immediate concern exists regarding protection of traditional and cultural areas or sites, the BLM would work with the Native or village corporations to inventory, designate, and post trails to avoid negatively impacting such sites."
0034-1	I think that BLM should take a more proactive approach in management like limiting the ORV size to 1,500 pounds. I say this because you see the Klutina Road, that was a trail, now it's a road. The same thing is happening in Chistochina. The Chistochina trail is now becoming like the Klutina, a road. And I feel very strongly about this.	For ANCSA 17(b) easements, the reserved uses of the easement are listed in the interim conveyance or patent documents. If the easement is a 25-foot easement, there is an upper limit of 3,000 lbs. Gross Vehicle Weight (GVW) for OHVs. 50 trail and 60 foot road easements allow GVWs higher than 3,000 lbs. For trails other than 17(b) easements, Alternatives C and D consider weight limits for specific travel management areas under Implementation-level Considerations in the Draft RMP/EIS on pages 35-48.
0035-1	The pleasure of working hard to travel through this spectacular country using one's own power is a large part of the reward of skiing and climbing, and can be greatly compromised by the activities of snowmachines in the vicinity. Unfortunately, the presence of this type of country and access to it is fairly limited. While I am not a fan of regulations and restrictions, I feel that designating and enforcing a "no motorized transportation" zone is the best solution to the growing conflict between motorized and non-motorized users. Please designate all drainages flowing into Augustana Creek as "non-motorized." In addition, I would like to see the following popular skiing/climbing areas designated "non-motorized" to help balance the extremely high levels of snowmachine use that occur to the south: Castner Glacier; Fels Glacier; Canwell Glacier; McCallum Creek and Glacier and West Gulkana Glacier	Alternative C would close the Augustana and Canwell sub-units to motorized use year-round. This area includes portions of the Fels, Canwell, Castner, and Augustana glaciers. Alternative D would close a portion of these units to snowmachine use. Under Alternatives A and B, they would be managed as is.

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0035-4	That area [Augustana Creek on the west side of the Richardson Highway in the Alaska Range] has been a favorite skiing and climbing destination for me and many Fairbanksians for quite a while now. And as of yet it's still been more or less unfound by the hordes of snowmachiners that use the country just a little ways to the south of there. If it starts to be used for snowmachiners I'm afraid that it wouldn't be nearly as attractive for those of us who get there under our own steam.	Alternatives C and D of the Draft RMP/EIS propose this area as closed to snowmachines, except when used for access for subsistence hunting.
0038-2	Within that area, if we're talking trails, I have not seen any figures or facts on actually wherever there is trails, how much area those trails actually take up. I think in these vast areas of land, that basically these trails are just little slivers. They're not even--if you take the whole vast area they're not even really noticeable. If we actually did honestly of saying how much area is directly impacted by trails then there might be another category of how much area could be potentially impacted and so forth.	As stated in the Draft RMP/EIS on page 160, 720 of approximately 1,200 miles of trail on BLM-managed lands have been mapped and assessed for resource impacts. A map of these trails is presented in the Draft RMP/EIS on page 163. The Proposed RMP/Final EIS on page 194 has been edited to include some representative trail densities, based on trail assessment work conducted in 2003 and 2005. These figures show that trail densities in the planning area are comparable with those in parts of the Lower 48.
0040-1	I believe the BLM needs to maintain these trails [in the Copper Basin] by adding planks to help minimize erosion.	BLM already uses a variety of trail-hardening techniques on BLM-managed lands in the planning area. Specific considerations for trail maintenance will be considered in implementation-level planning, as described in the Draft RMP/EIS on page 33.
0042-3	It seems that of the alternatives you have available, there is consistent preference for motorized use and for development. It would be nice if there was a more balanced proposal that would give satisfaction to both motorized users and developers, and to quiet users and people who want an area to get away from development. I would also like to point out that this is in keeping with what local community members in the area prefer! I strongly support alternative C.	In the Draft RMP/EIS on page 174, Alternative C, BLM considers 281,000 acres of area that would be managed as non-motorized. BLM feels that there are numerous opportunities for primitive experiences on BLM-managed lands within the planning area, given that 69% of BLM-managed lands are currently classified as primitive within the Recreation Opportunity Spectrum (ROS) classes.

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0043-1	I've hiked extensively in the Rainbow Mountain/Canwell/Gulkana Glacier area and feel it offers such an excellent array of recreational opportunities as to seem obvious its preservation is the wisest course. BLM's suggestion of increased snowmobile usage and decreased non-motorized vehicle areas is contrary to the best use of the area. Sufficient snowmobile use already exists elsewhere in the area (as well as throughout Alaska) and it behooves BLM and other agencies, both state and federal, to save some areas for those who can enjoy Alaska on foot.	BLM's preferred alternative proposes that portions of the Augustana, Canwell, Fels, and Castner Glaciers be managed as a seasonally non-motorized area (no snowmachines except if used for subsistence hunting). The Proposed RMP/Final EIS has been edited, based on the strength of public comment, to include the McCallum Creek drainage in this area on page 73 and Map 9 on page 81. The Proposed RMP drops the Augustana drainage, based on proposed modification of PLO 5150 under this alternative to allow conveyance to the State.
0044-16	No new trails or staging areas should be developed along Windy Creek because of its critical habitat status. To add a trail along the creek would invite erosion and degrade the experience now possible in the area. The existing well-used gravel road is sufficient.	New trails or staging areas are not considered in any alternative for this area. Alternatives C and D would limit OHV use to designated trails in the area, which would minimize the potential for un-managed trail proliferation in the area.
0044-27	Alternative D generally does not provide adequate protection for the highly-valued wildlife and habitat and visual resources. Unrestricted OHV use (as per ADFG, 1990, stated in draft) will mean more unnecessary trails and more fragmented habitat.	Alternative D prescribes a "limited" designation for OHVs on almost all BLM-managed lands. For unencumbered BLM lands, this would result in designated trails, with designated trails located to provide access while minimizing resource impacts. For State or Native-selected lands, this would mean OHV users would be encouraged to utilize existing trails. BLM does not consider this "unrestricted OHV use" and feels it represents a significant change from existing OHV management, which is mostly unrestricted.
0046-1	There should be provisions for creating new trails. An application process similar to that used for new roads.	BLM clearly intends to consider construction of new trails, as described under Implementation-level considerations in the Draft RMP/EIS on pages 33-50. These implementation level planning efforts will include public involvement.
0046-2	The amount of land classified as "open" to OHVs is too extreme, from mostly open to none open. The plan should offer some areas as open.	Alternatives A and B consider most areas managed as “open” to OHVs.

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0046-3	Management of State selected lands. Alt D specifies OHVs as limited to existing trails. The State's Generally Allowed Uses allows the creation / construction of trails up to six feet wide using only hand tools. The plan proposal appears to be in conflict w/State rules.	The Draft RMP/EIS, under Alternatives C and D, would adopt OHV policy consistent with the State's statute, as described in the Draft RMP/EIS on pages 36 and 41. The State's Generally Allowed Uses (11 AAC 96.020) also includes "Conditions for Generally Allowed Uses" (11 AAC 96.025) which states that "vehicles must use existing roads and trails whenever possible." So, the BLM's proposed policy is not in conflict with the State's statute.
0046-4	The summary table should clearly state that the reference to OHVs exclude snowmobiles because this is different from the regular definition of OHV.	Thanks for the comment. The Table 3 in the Proposed RMP/Final EIS on page 58 has been changed in order to clarify that point.
0047-3	With the formation of new and hardened trails instead of closures and eliminations, the problems you see happening now would resolve themselves.	We agree that trail maintenance and routing trails on suitable soils and vegetation is a part of the OHV management equation. Specific trails maintenance and routing will be considered in implementation-level planning as described in the Draft RMP/EIS on page 33.
0050-2	[I] continue to support Alternative A, as this gives us the most amount of access, continues to work at what is far less restrictive than the other alternatives. One of the reasons that we continue to look at Alternative A as our biggest preference, is that, this is Alaska, this isn't the Lower 48 where they have as many problems as they are having with access there. Up here, there's still an awful lot of lands to be developed, there's a lot of trails that need to be developed, you know, we're talking about a state that has relatively a small road surface area in comparison to other states that aren't anywhere near its size.	Thanks for the comment. In the Draft RMP/EIS on page 32, BLM's first stated goal for Travel Management is to "manage trails to provide access to public lands, recreation, and subsistence opportunities." BLM is committed to maintaining access but also to start managing trails to minimize resource impacts that are occurring and documented in the Draft RMP/EIS. While it is true that Alaska is a large State with very low road densities, trail density in this area might surprise you. Information has been added to the Proposed RMP/Final EIS on page 194, based on 2005 trail inventory, that shows trail densities in the area.
0051-1	So on behalf of the non-organizational structure, and enjoying recreation and wildlife and sightseeing and that sort of thing, strongly agree that Alternative A should be kept as the main management approach to allowing free unencumbered transportation.	Thanks for the comment. The Draft RMP/EIS considers a range of travel management options, including varying amounts of areas open, limited, or closed to Off Highway Vehicles.

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0052-1	I would like to see a more detailed map of designated or limited trail before this is decided on. And I think that the BLM land should be in line with State use as defined and there should be a consistency between State and Federal government concerning recreational use.	The Draft RMP/EIS on page 33 describes each area designated in this RMP as limited or closed to OHVs would have an implementation level plan completed. A complete description of what this would entail (including public involvement) is included. The BLM has coordinated closely with the State of Alaska in this planning process, particularly on State-selected lands, to assure a high degree of management consistency wherever possible (see Draft RMP/EIS, page 564).
0058-1	We're primarily concerned with the off-road vehicle access because long-term Alaska residents are by length of residents older, by necessity, need off-road vehicles to access any distance from maintained roadways. So we are interested in maintaining access to the Mat-Su areas of Alaska not on the maintained road.	Please see response to comment 0093-2. BLM will continue to provide access to hunting, subsistence, and recreational opportunities.
0059-1	ACE supports areas of quiet recreation in the Canwell and Augustana subunits and would ask that BLM take a look at adding the Tonsina and Tiekel areas to OHV and ATV limitations.	Motorized restrictions are proposed and analyzed for these areas as part of alternatives C and D.
0060-12	For the most part, alternative D in the draft plan follows the state's precedent by requiring that OHVs stay on existing trails "whenever possible." While some OHV users, particularly in the Anchorage area, seem to feel that this is an unwarranted limitation, from our perspective it seems vague at best, and undoubtedly difficult to enforce. It leaves 99.4% of lands open to OHVs while only 0.6% are closed. We strongly prefer alternative C, and feel that it represents a more equitable strategy, since it still leaves 96% of the planning area to OHVs and restricts those vehicles to designated trails in only half that area.	Your comment is noted. Please see response to comments 0331-18 and 0312-73 regarding enforcement.

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0060-13	In addition to following the stipulations described in Alternative C, we recommend the following: In areas designated as limited to existing trails, trails should be surveyed and marked as soon as possible; The public should be educated regarding the OHV regulations through clear signs and other outreach efforts; Whenever possible, these regulations should be actively enforced; The additional closures under Alternative C within the Tonsina unit of the Tiekel Area should be implemented. Thus, the south unit would be closed year-round to motorized vehicles and the north unit would be closed seasonally from April 15 to October 15.	It is BLM's intent to conduct implementation-level planning on travel management units within the next five years, focusing first on long-term BLM managed lands. On other lands (State-selected), trail assessment work is continuing (400 miles were assessed in the summer/fall of 2005) and BLM intends to use education to inform the public about the benefits of using existing trails as well as the penalties associated with traveling off-trail and causing resource damage. Incorporation of the Tonsina sub-units are considered in Alternative C.
0064-1	With these large tracts of lands that you need to consider at least having some areas that are closed to motorized vehicles, is that, it seems the way society is going and motorized--one motorized vehicle can kind of ruin the day for a whole bunch of people by either ruining the trail and making it into a bog, which I've seen tens if not hundreds of miles of in a lot of places in the state, and non-motorized traffic can use an area for hundreds of years without destroying it.	The Draft RMP/EIS considers proposals that would close areas to motorized use (up to 281,000 acres in Alternative C), as well as management that would consider closure of specific trails to motorized use (see Draft RMP/EIS, Implementation-level Considerations, pages 33-50).
0067-2	I would say not to change things too much because the people that are making a living mining in some of these trails, not only that, the trails--some of the trails that are made, the animals use them too, especially in the winter, the snowmachine trails, you'll see moose tracks. It's a lot easier for them to survive and walk, it saves their energy when the snow has been packed for them, and you will see that.	The Draft RMP/EIS analyzes Alternatives (A and B) that would make very few changes to the current travel management.

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0068-1	I would like to see the Denali Highway stay the same as it is. I don't think the snowmachiners are bothering the vegetation whatsoever. If they did there wouldn't be none on Summit at all. And I don't see where there should be any change on, at least, the snowmachiners in the wintertime because I don't think they're bothering anything.	Thanks for your opinion. Alternatives A and B would impose no additional restrictions on snowmachine use.
0070-1	I would like to see open snowmachine access. I don't really see a reason to limit snowmachining. It seems to me that most people stay to the open areas, they stay out of the willow, alder thickets, whatever, they're not going to thrash around in there so I don't see a whole lot of vegetation damage occurring. I think most people are going to limit their snowmachining to when there's enough snow to protect their machine but also to protect the vegetation.	Within the range of alternatives presented in the Draft RMP/EIS, very little area is considered for snowmachine restrictions (4% in Alternative C, 1% in Alternative D, 0% in Alternatives A and B). Where restrictions are proposed, they occur in areas currently experiencing very little snowmachine use, in order to maintain an existing non-motorized experience.
0070-4	If you're going to do restrictions on ATVs, you might do it in a manner that blocks--blocks up areas or areas where you would designate upland areas for ATV use and not necessarily restrict them to a single trail. And where maybe higher value wetlands, emergent wetlands or whatever, that in those areas you may consider restrictions, but, you know, trying your hardest to provide access to perhaps areas that people are trying to get to behind them, next to them or around them.	Travel management areas have been identified and mapped within the Draft RMP/EIS, with a general designation of open, limited, or closed to OHV use assigned. Within limited areas, implementation level planning will determine specific designated trails or restrictions that occur. At this level of planning, there will be consideration for allowance of off-trail use for game retrieval, etc.
0070-5	In high recreation areas along the Denali Highway there's probably a lot of areas that are mucked out, you may consider geotech work on some of those trails, or trying to reroute them to some of the upland areas to get people back to the areas they want to go to hunt fish, whatever.	Glennallen Field Office has already utilized these techniques for trail maintenance and hardening, particularly in the Tangle Lakes Archeological District. As described in the Draft RMP/EIS, Implementation-level Planning, page 33 we intend to continue this kind of trail maintenance and re-location, based on site-specific information and on-going trail assessment.

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0077-3	I feel it's important to include a balanced approach to the use of ATVs in your management plan for the area. Quiet recreationists such as skiers, hikers, canoeists and climbers must be treated fairly in this plan. Please consider the following: Although there should have been more non-motorized areas designated in the Delta Range, the two Delta Range non-motorized areas that made it into the final round should remain in the plan.	See response to comment 0042-3. And…the Delta Range non-motorized areas are still considered within the Proposed RMP/Final EIS.
0078-1	[I]t is very important to have areas that are off limits to motorized vehicles. Please consider that 95% of Alaska is open to snowmachines. Please remember that there are many of us that value wild areas. Don't forget about our hopes and our wishes. I'm hoping the Castner, Fels & Augustana glaciers will be designated off limits to motorized use.	Please see response comment 0077-3.
0080-3	Further be it resolved, the Southcentral Regional Council recommends provisions with greater water quality, erosion, habitat, and fish and wildlife resource protection through ORV management. Local testimony emphasized concern about inadequate regulation of ORV/ATVs, with the result that stream crossings contaminate and degrade water quality, over use of trails leads to development into roads, roads/trails take people into stream headwaters where human waste and trash are inadequately disposed of, and unregulated access leads to encroachment on fish and game refuge habitat and adverse impacts on wildlife behavior patterns.	The Draft RMP/EIS also recognizes resource impacts associated with unregulated OHV use (see Draft RMP/EIS, Chapter 3, pages 182, 188, and 195). Documented resource impacts and the need to continue to provide for a diversity of recreational experiences drive the OHV proposals described in Alternatives C and D, where most BLM-managed lands are designated as limited to OHVs, with site-specific limitations to be determined in implementation level planning.

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0092-1	I feel the need to point out that gross vehicle weight is NOT a good way to determine how much trail damage a vehicle is capable of inflicting. Pounds per square inch of contact surface would be a much better means of determining this. I own a Hagglund SUSV (small unit support vehicle) which is street legal but is considered to be an off-road vehicle. It has four tracks, each with a contact surface of 24" by 80". It weighs about 9000 pounds and with more than 7,500 square inches of track contact surface exerts about 1.2 pounds per square inch. Compare this to a highway vehicle weighing 9000 pounds with about 320 square inches of tire contact surface; that's about 25 pounds per square inch. Four wheelers have similar high weights and to complicate the issue, wheeled vehicles tend to almost constantly churn the trail surface in order to maintain forward momentum. Add the fact that track vehicles are capable of hauling multiple people and very heavy loads and it is obvious that damage from wheeled vehicles is an order of magnitude more significant.	We agree that it is impossible to generalize about impacts of "standard" 4-wheelers vs. tracked vehicles. Studies conducted along the Denali Highway in the early 80's showed that impacts to vegetation and soils from OHV use (including tracked rigs) varied widely based on soil and vegetation types. Concerns with tracked rigs often revolve around the width of trail they create, particularly through black spruce vegetation, and the subsequent development of road-like trails as a result.
0093-2	[Y]our plan will be limiting access and availability of natural outdoor activities. Who is going to enforce the laws on these new provisions? The state? Federal? And where is the money coming from? User fee?	We disagree. BLM's clearly stated goal for travel management is to "manage trails to provide access to public lands, recreation, and subsistence opportunities." (Draft RMP/EIS page 32). Proposals under the preferred alternative would ultimately prohibit the wide-open, cross-country travel that now occurs, by limiting OHVs to existing or designated trails. However, major existing access routes will not be closed. BLM will provide enforcement on BLM lands.

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0097-6	[I]t is AQRC's [Alaska Quiet Rights Coalition] opinion that adopting the State's "Generally Allowed Uses" as BLM's standard for interpreting Limited on the selected lands , which constitute 5 of the 7 million acres covered by this Plan drastically undercuts the purpose of the Limited designation. The state's policy limits OHVs to existing trails "whenever possible". (We find the language used in the Plan's text and tables to be misleading and inaccurate when characterizing the state standard simply as limiting OHVs "to existing trails'".) The wholesale proliferation of trails on general state lands, and the widespread resource damage, shows this policy does not work-it does not restrict riders to existing trails. We believe the qualifying phrase acts as a license which gives permission to any rider to make a new trail whenever he/she wishes. Further, the inherent ambiguity of the language makes enforcement impossible.	Please see our response to comments 0006-2 and 0159-1.
0156-1	Ref page 34: This area [Copper Basin] has been used for years by both the state and federal subsistence hunters, any restrictions on ORV use would have a significant effect on the hunting.	The Draft RMP/EIS on page 34 recognizes the importance of trails for accessing subsistence resources, and states "all proposals for OHV management considered below would be consistent with section 811 of ANILCA…"

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0156-2	Ref. page 36: Any restriction on ORV use is not necessary; there is little use in this area until hunting starts. Designating trails for snow machines use in the West Fork area is also not needed. There is no biological proof that snow machines use in the West Fork are impacting moose. Putting restrictions on snow machines use would impact the area trappers, who are helping area moose by trapping wolves. Also any designation of those trails as public use trails would greatly impact local area trappers. As it could draw recreational snow machines to the area.	These are implementation-level considerations. The BLM is committed to working with the State (including DNR and ADF&G), Ahtna Native corporation, and the general public when this level of planning occurs.
0156-3	Ref. page 38: The Denali Highway area has always been used by ORV for hunting, fishing and recreational travel, there is no evidence that demands any immediate need to promulgate new regulations to significantly restrict the use of ORV and limiting ORV only to trails is also to restrictive. The use of ORV in most instances distributes the hunting pressure through out the area. Most of the area is high country and any damage by use would not be high.	While your assessment for the Denali Highway area may be correct for hunting and fishing use, BLM also is mandated to manage for recreational use. Our goals, objectives, and management intent for recreation are outlined in the Draft RMP/EIS on pages 55-66. This includes the need to managed for a diversity of recreational experiences, which, in some areas, may require OHV regulation, such as described under Travel Management for the preferred alternative (D). We disagree that under current management and unlimited OHV use, "any damage by use would not be high" for the Denali Highway area. Our current trail assessments show extensive muck holes and braids of 100 feet or more on several trails in the area, including Butte Lake and Seattle Creek.
0156-4	Ref. page 39: Travel management plans C and D are too restrictive[.] … This is state, federal, private and native lands, any closing of federal land to ORV will place moose hunters and users on the state, private and native lands which could impact our game animals. Any regulations on ORV should be for specified length and reviewed at regular intervals.	We disagree. While trail management proposed in Alternatives C and D may cause some displacement of those looking for an "unregulated" experience, it may attract other users looking for maintained trails or non-motorized opportunities. Our use data shows no downward trend in motorized use within the Tangle Lakes Archeological District (where OHV travel is currently limited to designated trails). The area is still being utilized by hunters accessing both state and federal lands.
0156-5	[A]ny regulations should not be put in place with out local Fish & Game, the local advisory committee's, both State Board of Fish & Game, local users and the native Corporations are included in the planning effort.	BLM has included and received comment from all these entities during this planning process. Input from these entities will be invited and encouraged during implementation-level planning.

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0156-6	Ref. page 375: Travel management, both C and D are too restrictive and offer no open ORV areas, this limits subsistence hunting. Primarily motorized sport and subsistence hunters use the area of Unit 13. This area is mostly non-road accessible and travel by ORV is one of the ways to spread hunters and users apart. The lands have with stood decades of motorized use without significant resource damage or lost of wild life.[sic]	Under Alternatives C and D, all areas would be managed under a "limited" OHV designation. This means, in most cases, that OHV travel would be limited to existing or designated trails, not that trails would be closed. BLM's intent is to limit unmanaged cross-country travel. It is not BLM's intent to stop considering the need for new trails…this is clear in the Draft RMP/EIS on pages 33-50, where new construction of trails is discussed for several travel management areas under Implementation level considerations. We disagree with your assessment of significant resource damage, particularly to soils, vegetation, and water. Even ADF&G, in their 1996 report the Board of Game on ORV and snowmachine use in Alaska, stated "ORV use in [Unit] 13A west of Lake Louise has caused visible environmental degradation." Apparently their opinion has changed.
0156-7	Ref. page 375: C & D are too restrictive; the plan should protect the long-standing tradition of motorized access established many years ago. BLM needs to understand the increase demand for ORV use. A key designation would be to make preservation of ORV use as high a priority as preserving the environment. The goal should be to ensure that the area is managed so motorized use will continue. The over all impact of ORV for the size of the area is small.	See our response to comment 0156-6.
0156-8	There is no conclusive evidence that demands an immediate or at any time in the near future a need for new regulations that restrict the use of ORV in Unit 13.	We disagree. BLM's regulations for Off-road vehicles state: "No person shall operate an off-road vehicle on public lands in a manner causing, or likely to cause significant, undue damage to or disturbance of the soil, wildlife, wildlife habitat, improvements, cultural, or vegetative resources or other authorized use of the public lands." (43 CFR 8341.1). Impacts are described in the Draft RMP/EIS on pages 168-171, 182, 188, and 195.
0156-9	Any potential regulations deemed necessary by BLM, state, private and native agencies should be for specified lengths of time and be reviewed at regular intervals to determine if they remain appropriate.	We can't speak for "state, private and native agencies" but this would be a part of our implementation and monitoring process.

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0159-1	BLM needs to adopt, as part of the Final Plan a requirement that at the moment the ROD is signed, all 7,000,000 acres, for however long they remains in BLM's management and ownership are Limited, to OHVs, to existing trails. In effect, freeze the footprint. ...[T]he Preferred Alternative indicates that in the main, BLM will "manage" OHVs on the 5,000,000 acres of selected lands by adopting the state's Generally Allowed Uses on State Land. This policy has not worked as any survey of the state's general lands would show. In fact, one of the highest concerns expressed in scoping was the continued proliferation of OHV trails and the accompanying resource damage. The policy is so loose that anyone at any time can create a new trail and claim they are following the policy. … Keeping OHVs on existing trails would also provide some benefit to the quiet recreationist, by enabling them to backpack in areas that at least theoretically do not have OHV traffic.`	We agree and the intent of the Preferred Alternative (D) is to limit OHV users to existing or designated trails. However, in order to designate trails in any given area and enforce no OHV travel off of designated trails, the following must occur: a) complete inventory of all existing trails in the area; b) determination of which trails are necessary based on public input, providing for subsistence, recreation, resource development, etc; c) publishing the designated trails in the Federal Register; and d) enforcement. BLM recognizes that it is not ready for that level of detail in this RMP decision. Therefore, it must set the stage in this RMP and prioritize areas for implementation-level planning. Logically, the first priority is for areas that we know we will manage long-term. In the meantime, BLM will increase it's OHV management on other lands (such as State-selected lands) through education and enforcement.
0159-2	The Plan makes virtually all of the lands currently managed by BLM open to snowmachine use. The Preferred Alternative closes all of 44,000 acres to snowmachines. This is not enough; it is unfair and BLM is not meeting its responsibilities to provide recreational activities for all users of its lands.	Please see response to comment 0006-19.
0164-12	Ahtna Inc. supports more active management of selected lands in regards to OHV use that is outlined under Alternative C	Thanks for the comment.
0164-15	Limitations on recreational snowmachine use in known caribou and moose winter range should be put in place, monitored, and enforced.	Under Alternatives B and C, designated trails for snowmachines are considered in very specific areas, based on moose or caribou winter ranges. See the Draft RMP/EIS pages 35-50. These would be considered in implementation-level planning, with input from the State, Native corporations, and the public. The State of Alaska, ADF&G, currently does not support such restrictions.

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0164-16	Ahtna supports the subsistence use of any vehicle that is 1500 pounds or less and monitoring the use of these vehicles in relation to resource damage and disturbance of fish and wildlife.	See response to comment 0164-17 regarding vehicle weight limits. Trail and OHV monitoring is described in the Draft RMP/EIS on page 33.
0164-17	Ahtna supports a weight restriction on all trails for vehicle use of over 1500 pounds	On 17(b) easements, there is currently a 3,000 pound GVW limit for OHV on 25-foot wide trail easements. In the Draft RMP/EIS on pages 33-50, BLM clearly shows the intent under implementation-level considerations to apply weight limits to some specific trails. These will be determined based on other factors such as resource considerations or maintenance of recreation experiences. Consultation will take place with Native corporations, other land managers and the public.
0169-3	We support all types of trails and recreational development. This support includes single use trails such as hiking and biking trails as well OHV trails. Certain terrain types lend themselves to the different types of trails, i.e. steep and rugged terrain is more suitable for hiking trails. While most trails should be multiple use to provide for equal access, there could exist within the trail network single or compatible use trails to maximize the recreational experience.	We agree. BLM is committed to providing different recreational experiences and to providing access to public lands for recreation, subsistence, and hunting. The factors you describe to be used in trail management will be applied in implementation-level planning to determine how specific trails should be managed, re-located, or maintained.
0173-36	Access within the planning area should not be limited and all trails should remain open. Access should be provided to all mining claims and private property.	Providing access is a clearly stated goal of the BLM under Travel Management in the Draft RMP/EIS on page 32.

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0175-11	Page 32, Goals. The State would appreciate explicit acknowledgement of the need to ensure access for resource development. In many instances off-highway vehicle (OHV) access to mining claims and exploration areas is the most efficient, cost-effective and least intrusive means available. A goal statement at the beginning of the OHV discussion, acknowledging this resource development need and an explanation as to how access can be achieved within the structure of this plan and Issue 1 would be helpful.	BLM's goal to provide access is clearly stated. In the Draft RMP/EIS page 32, the issue statement includes "commercial uses". Land Use Requirements in the Draft RMP/EIS on page 33 clearly state that permitted activities and uses would allow OHV use, subject to stipulations to minimize impacts. This is consistent with the Required Operating Procedure ROP-Soils-b-3.
0175-19	Page 38 and 44, Delta Range Area (including Canwell and Augustana Sub-units). The Bureau proposes to close the Canwell and Augustana sub-units to off-highway vehicles without a substantiated justification for closure. The State strongly supports OHV access particularly for resource development in this area when needed to facilitate exploration and development of subsurface resources and opposes such closures at the RMP level. The State requests that Alternatives C and D be revised to move the discussion regarding closure of the Canwell and Augustana sub-units to snowmachines from (a) RMP Decisions to (b) Implementation-level Considerations. As previously discussed, the State requests that such closures be developed in a more focused consultation with the user community and resource managers through development of an implementation-level plan that includes a public process.	These areas are proposed (Delta Mountains sub-unit) to maintain an existing non-motorized winter recreation experience in rugged, glaciated terrain. This justification has been added to the Proposed RMP/Final EIS on page 70 and 73. The Draft RMP/EIS also considers Alternatives A and B that do not consider designation of these areas. Under the Preferred Alternative, the current withdrawal against mineral leasing would be maintained but mineral entry would be permitted outside the inner corridor of the pipeline. BLM would permit OHV exploration or access into this area, consistent with ROP-Soils-b-3 (Draft RMP/EIS, page 611) and through development of a Plan of Operations (Draft RMP/EIS, Locatable Minerals, page 124). Identification of these subunits in an RMP is consistent with BLM land use planning direction and 43 CFR 8342.1.

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0175-20	Pages 38 and 44, Denali Highway Area, Implementation-level Considerations. Off-highway vehicles use this area extensively for hunting and fishing access and recreational riding, which is consistent with the State's Susitna and Copper Basin area plans. We request the Bureau not pursue restrictions, other than the "limited" designation consistent with State regulations, on current uses until a joint planning effort completes an evaluation of the resources and habitat concerns. Furthermore, it is likely that during implementation level planning the state will object to limitations on OHVs that limit areas based on minimizing impacts to the viewshed, maintaining a diversity of recreation opportunities, or any snowmachine restrictions based on trail densities.	The Draft RMP/EIS page 33 described that implementation level planning would include public, State, and Native corporation coordination. It is likely that the BLM, during implementation level planning, will propose reasonable designation of trails to minimize impacts to the viewshed and to maintain a diversity of recreational experiences. This is consistent with objectives for the area stated in the Draft RMP/EIS on pages 61 and 62.
0175-21	Management of the Tiekel Area within the plan has the potential to restrict users inconsistent with the State's regulations for uses on state lands. There are some additional restrictions on use of off-highway vehicles under State regulations for hunting within the area. The BLM proposed restrictions are not substantiated in the plan based on biological concerns beyond those already addressed under state restrictions on use of off-highway vehicles for hunting. We request the Bureau provide substantiated reasons for increased restrictions in this area or delete the considerations.	The alternatives described in the Draft RMP/EIS consider a wide range of travel management options in this area, including leaving the area "open" to all OHV use. Justification for managing the sub-units as non-motorized in alternatives C and D is described on pages 59 and 63 (to maintain a primitive recreation experience). It is not biologically-based, but is consistent with the stated recreation goal to manage recreation to maintain a diversity of recreational opportunities (page 55). These proposals, while restricting motorized access to the area, would not be inconsistent with the existing State Tonsina Controlled Area, which is closed to using motorized vehicles for hunting, including the transportation of hunters, from July 26 to September 30.
0175-36	Page 167. Please include a reference to 11 AAC 96.025 Conditions for Generally Allowed Uses as well as 11 AAC 96.020.	Thanks for the editorial comment. 11 AAC 96.025 is a critical part of the statute and a reference to it will be included in the Proposed RMP/Final EIS (page 44, 49, and 192).

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0175-37	Page 168, Subsistence Use of OHVs. This section discusses access by off-highway vehicles for subsistence activities, but the plan does not define the reference as 'federal subsistence only' or 'federal and state' subsistence activities. Since much of this area has appreciable hunting under state regulations that include subsistence uses, OHV restrictions could adversely restrict subsistence uses.	ANILCA allows for "appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation." (page 34, Draft RMP/EIS). For travel planning purposes, this includes both federal and state subsistence activities.
0175-52	Page 573, Delta Range SRMA. The State recommends that under Alternative D for the Delta Range SRMA, Trails/OHV management be amended to specifically provide for permitted motorized use associated with resource development. As currently stated, Alternative D appears more restrictive than Alternative C. In addition, the State was unable to find documented justification for such a closure either in the narrative in Chapter II or in the summary table. We request that limits on use be justified and documented for the public.	First portion of the comment: The change has been made in the Proposed RMP/Final EIS (page 52). Thanks for the comment. Second portion of the comment: Justification will be strengthened in the Proposed RMP/Final EIS, based on maintenance of the current primitive experience and public comment (page 52 and 73).
0175-53	Page 575, Delta River SRMA. The State recommends that under Alternative D for the Delta River SRMA, Trails/OHV management be amended to specifically state that there are no snowmachine restrictions provided adequate snow cover exists, rather than the language "open in winter." This approach would be consistent with other tables and provide additional clarity.	Thanks for the editorial suggestion. The change has been made in the Proposed RMP/EIS.

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0180-1	There is a sense of direction in this document for limiting the use of off-road vehicles. This is not a good thing for me. The closing of and/or limiting vast amounts of area to control a very small "footprint" seems extreme. Furthermore, I do not see the brazen expansion efforts to blaze trails all over creation. There are high use areas and lots of increased use so coming up with OHV guidelines seems like a more reasonable direction to take rather than the closing of areas.	The Draft RMP/EIS considers a range of alternative management strategies for OHV management. However, even under Alternative C, the most potentially restrictive alternative to OHV users, only 4% of all BLM lands within the planning area is proposed for closure to motorized vehicles. Under alternatives C and D, most areas would be limited, with OHV use limited to designated or existing trails. BLM is committed to maintaining access to public lands and is not looking at closure of areas or trails on a large scale, under any alternative.
0181-1	Please provide for adequate non-motorized recreational uses for BLM lands in Alaska. Motorized use is simply not compatible with non-motorized uses. Motorized uses are excessive in some areas, particularly the Knik River drainage. Excessive motorized uses cause wildlife disruption, soil erosion, and pollution.	The Draft RMP/EIS considers a range of alternative management strategies for OHV management. Alternatives C and D include the designation of some non-motorized areas as well as management intent in implementation level planning to manage specific trails for non-motorized use (pages 33-50, Draft RMP/EIS). The Knik River drainage does not lie within this planning area. Impacts of motorized uses are described on pages 168, 169, 182, 188, and 195 of the Draft RMP/EIS.
0185-1	Alternative C is the most reasonable option with regard to limitations and closures to OHV use. Statewide, the management of OHV use in accessible areas is quite inadequate. Managing OHV use in remote areas is impossible and does not happen. There is no mechanism to ensure wise, sustainable use. BLM should take the long term, conservative perspective in considering OHV management. ... Anadromous streams are in grave danger with one documented loss already. People are claiming motorized use is traditional where it was not and with imminent threat to the sustainability to the wetlands and extremely narrow transitional zone.	Alternatives C and D represent a significant change from the status quo and set the stage for proactive management of trails rather than unmanaged proliferation of trails. Habitat assessment of anadromous streams and rivers by BLM and ADF&G would not support the statement that anadromous streams are in "grave danger" but BLM recognizes some of the ongoing and potential impacts, as described in the Draft RMP/EIS, Chapter 3, pages 182, 188, and 195.

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0187-1	My primary interest/concern is that BLM goes the extra mile to redress the years of "non-management" that have allowed mechanized recreation to overwhelm non-motorized and quiet opportunities. Alternative C is the only alternative that will truly achieve this balance, and I strongly support this option in terms of travel management and recreation management.	Thanks for the comment. Alternatives C and D represent a significant change from the status quo and set the stage for proactive management of trails rather than unmanaged proliferation of trails.
0188-1	Please do not adopt any restrictions that would interfere with me hauling my moose and caribou out to the road.	The Draft RMP/EIS considers a wide range of management actions regarding travel management, including very few OHV restrictions in alternatives A and B. Under the Preferred Alternative (Alternative D), on State-selected lands, you would be encouraged to use existing trails. If you went off the trail to retreive your moose or caribou and in doing so caused significant rutting, disturbance of vegetation, or sedimentation into streams, lakes, ponds, or marshes, you would be subject to a violation notice. On unencumbered BLM lands, trails would be designated and travel off of designated trails would be restricted. Specific trail designations and restrictions would be determined in implementation-level planning.
0192-1	I am also concerned about weight restrictions being placed on off road vehicles. What I have seen this restriction would do away with the use of tracked vehicles. Please do not restrict by weight as track vehicles lay down a matt on which to travel, therefore doing less damage to the land.	Alternatives C and D would consider weight restrictions in specific travel management areas during implementation level planning. Specific determinations for which trails would have weight limitations would be determined in implementation-level planning, as described on page 33 of the Draft RMP/EIS.
0200-1	When has the BLM ever attempted to map the trails used by the old timers.	As stated on page 160 of the Draft RMP/EIS, 720 of approximately 1,300 miles of trail on BLM-managed lands have been mapped. This effort continues and will continue as implementation level planning occurs. This year (2005) approximately 400 miles of trail were mapped and assessed in detail.
0253-1	Where BLM believes there are resource impacts, these can be mitigated by relocating trail to more suitable areas with better soils, or by using one of the many trail hardening techniques.	We agree, as described in the Draft RMP/EIS under Implementation-level Planning (page 33) and in the description of Implementation-level considerations under alternatives C and D, Travel Management.

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0264-1	If restrictions are placed on these lands OHV users will lack the same basic right to enjoy our vast state that non motorized users have - and continue to have if access is not restricted.	BLM is committed to maintaining access to public lands, as clearly stated in the goals for Travel Management on page 32 of the Draft RMP/EIS. BLM is also committed to managing resource impacts resulting from unmanaged proliferation of OHV trails. The Draft RMP/EIS considers a wide range of travel management strategies that address this issue.
0267-1	Page 536: In general within the planning area, OHV use is expected to become more restricted . . . : (how did you arrive at the conclusion.): and then in the next paragraph you make the comment . . . With an increase in OHV users and improvement in OHV (this seems to be contradictive to the previous paragraph.) You mindset does not appear to use the information you've been provided.	The first conclusion was reached because of the anticipated increase in intensity of OHV management on BLM, NPS, and Native lands. It is assumed that this may be off-set by an increase in OHV users over time and improvements in OHV technology.
0271-1	I am greatly disappointed at the statement on page 536 that says "ORV use is expected to become more restricted over the planning period, regardless of the alternative selected by BLM.	This assumption is based on the anticipated increase in intensity of OHV management on BLM, NPS, and Native lands within the planning area.
0274-1	If your plan is to provide truly diverse recreational and educational opportunities the use of off road vehicles should not be further limited.	Thanks for your comment. Your suggested management strategy is proposed and analyzed in alternatives A and B.
0278-1	It is extremely important that the plan allow diverse recreational opportunities. Diverse recreational activities must include motorized vehicles. Access to recreational areas should be evenly distributed throughout the areas affected by this plan. There is plenty of land in Alaska that is already closed or limited in access. However that should allow for plenty of land for "diverse" recreational activities to the place near population centers and along the road corridor outlined in this plan.	BLM agrees with your stated goal and it is clearly stated as a goal for recreation (page 55, Draft RMP/EIS). The Draft RMP/EIS recognizes motorized use as part of the recreation opportunity spectrum that currently exists and will be managed for across the planning area (pages 174, 175, Draft RMP/EIS).

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0291-1	I am very concerned the BLM management plan is not recognizing the "in place" State regulations allowing tried and proven usage of many of the areas the BLM seems intent on restricting and or closing.	Alternatives C and D very clearly strive for consistency with State regulations for OHV management, particularly on State-selected lands. Pages 36 and 41of the Draft RMP/EIS describe management criteria for OHVs for State-selected lands, consistent with existing State statutes.
0306-3	Alternative C is the most reasonable option with regard to limitations and closures to OHV use. Statewide, the management of OHV use in accessible areas is quite inadequate. Managing OHV use in remote areas is impossible and does not happen. There is no mechanism to ensure wise, sustainable use. BLM should take the long term, conservative perspective in considering OHV management.	Thanks for the comment. We agree that OHV management has been inadequate and this is discussed and analyzed through a range of alternatives in the Draft RMP/EIS.
0311-4	We also oppose recognition of any illegal roads and trails created by illegal use of ATV/OHV's, oppose any increase in ATV trails and use areas, and support seasonal and size/weight limitations for OHV/ATV's.	Currently, all BLM-managed lands, except Tangle Lakes Archeological District and the Gulkana and Delta River corridors, are open to OHV use, including cross-country trails off of existing trails. Thus, no "illegal" trails are displayed on the map on page 163 of the Draft RMP/EIS.
0312-72	We are strongly opposed to the "no action" OHV management strategy proposed in alternative A because it makes no attempt (except in limited areas) to manage OHV trails. We believe that BLM has presented very compelling and factual justification…for not choosing Alternative A for OHV management.	Thanks for the comment. Alternative A is not BLM's preferred alternative.
0312-73	The State of Alaska's Generally Allowed Uses (11 AAC 96.025) should absolutely not be the only means by which BLM administered lands are managed, even if they are selected for conveyance to the State. The widespread proliferation of OHV trails and associated resource degradation on general State lands is evidence that the State's policy to limit OHVs to existing trails "whenever possible" is simply not an effective management strategy.	As described in alternatives C and D, the BLM does not adopt the State's statute, but adopts policy consistent with the statute. The State's statute has not been effective on the ground because of the statute but because the State has chosen not to enforce it. It is the BLM's intent, on State-selected lands, to emphasize education regarding the policy and the benefits of using existing trails, but also to enforce where deliberate OHV use off of existing trails is causing resource damage as described on page 36 and 41 of the Draft RMP/EIS.

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0312-74	Regardless of which draft alternative is ultimately selected, trails signage, public education efforts, and OHV impact mitigation measures should be implemented immediately, especially within Wild and Scenic River corridors, sensitive wildlife habitats, non-motorized use areas, and all other special management areas discussed within this document.	We agree, and BLM has already begun to prioritize implementation planning based on the factors you mention. The Gulkana plan revision is close to completion and the Delta River plan revision is scheduled for 2006.
0313-2	We have reviewed 11 AAC 96.020 and 11 AAC 96.025 and see no indication that traveling cross country is limited to game retrieval or other reasons directly related to hunting activities. We believe the Generally Allowed Uses are written to allow cross country travel when an established trail does not exist and care is taken not to disturb the vegetative mat.	You are correct. The key is that travel off of existing routes must minimize "disturbance of vegetation, soil stability, or drainage systems; changing the character of, polluting, or introducing silt and sediment into streams, lakes, ponds, water holes, seeps, and marshes; and disturbance of fish and wildlife resources." (11 AAC 96.025)
0319-1	I encourage you to enlarge the designated no motorized vehicle areas. There are plenty of motorized areas, and some tourists will be more likely to come to these areas which epitomize the pristine wilderness.	Based on public comment, alternative D of the Draft RMP/EIS has been revised in the Proposed RMP/EIS to include the McCallum Creek drainage as part of the Delta Mountains sub-unit of the Delta Range SRMA (page 73, Proposed RMP/Final EIS). This area would be closed seasonally to snowmachines.
0321-3	OHV use must be restricted to designated trails only, and must not occur within potential or designated Wild and Scenic River corridors or other sensitive and protected areas.	Alternatives C and D consider travel management options that would limit OHVs to designated trails, based on recreation objectives as well as specific resource concerns. Consistent with ANILCA (sections 811 and 1110), alternatives C and D would designate trails within Wild and Scenic river corridors, but would allow motorized use on designated trails to access subsistence resources.
0321-4	These trails must be assessed and maintained as some trails are at least 200 yards wide.	See responses to comments 0038-2 and 0200-1. On-going maintenance is clearly intended, as described on page 33 of the Draft RMP/EIS under Implementation-level Planning.
0321-5	Furthermore, we ask that the south unit of the Tonsina unit of the Tiekel area be closed to all OHV use and the north unit be closed seasonally as proposed in Alternative C.	Your request is considered and analyzed as part of Alternative C in the Draft RMP/EIS.

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0323-3	EPA encourages BLM to carefully consider the long-term benefits of committing to an environmentally protective strategy now, in this RMP and EIS and in the Record of Decision, in order to: 1) define appropriate trails for OHV travel; 2) develop and implement an effective monitoring and enforcement program; 3) limit or prohibit OHV use in sensitive habitat areas, areas of high value for quiet recreational pursuits and areas where effective monitoring and enforcement cannot be assured; and 4) commit to an effective and timely notification and education effort to inform the public.	This RMP, through implementation of the travel management strategy described in the preferred alternative, would set the stage to take the steps that you describe. At this time, we simply do not have the trail inventory and assessment or level of public involvement needed to make specific trail determinations. BLM has committed to completing specific implementation level planning for travel management areas in the next five years. BLM's intent to accomplish the steps you describe is evident in the Draft RMP/EIS, particularly on pages 33-50 and the descriptions on page 33 of Inventory and Monitoring and Implementation-level Planning.
0323-4	It is particularly important for BLM to include in this document a proactive strategy for OHV management, so it may be used as a model for additional RMPs that are scheduled for completion in other parts of Alaska in the near future. In general, EPA recommends that where OHVs are allowed on BLM-managed lands, their use should be limited, to the maximum extent possible, to established existing or designated trails. As documented in the Draft EIS, this management strategy for OHV use would minimize rutting, braiding, thermal erosion and subsequent adverse impacts to soil and vegetation.	We agree. This strategy would be adopted under Alternative D, with priority for implementation on unencumbered BLM lands (those that BLM knows it will manage in the long term).
0327-1	I urge the BLM to adopt Alternative C. Winter travel does not have a degrading impact on the vegetation / tundra. ORV use by wheeled vehicles destroys and degrades any of the areas where used.	Thanks for the comment.
0329-19	The Alternative C proposal [for the Tiekel SRMA] is still overly generous to motorized use, considering the huge areas already open.	We feel that closing approximately 240,000 acres to most motorized uses is not "overly generous" to motorized use.

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0329-27	Please consider alternative management options for OHVs. For example, many areas should be designated "closed" to OHVs, at least seasonally. It just is not practical to try and maintain a trail through some of the extensive wetlands in the Gulkana system, for example. The Tiekel SRMA could reasonably be closed in summer. Elevation limits could be put in place for winter motorized use.	The Draft RMP/EIS considers some of these options and effects of implementing them in Alternative C.
0329-28	One unexplored management option for limiting OHV damage is to simply not to encourage them. Not building ramps or big parking lots, or advertising recreational OHV opportunities, is probably the cheapest, easiest, least controversial, and most effective thing that BLM could do. Since we know that existing trails are causing harm, every extra OHV than comes increases damage. Please adopt a management practice into the RMP to not unnecessarily encourage increased OHV use. Obviously, this approach isn't sufficient by itself. But to the degree it is feasible, it should be followed.	Thanks for the comment. This is, in fact, a key factor in managing to maintain primitive recreation experiences in a non-regulatory fashion. The Draft RMP/EIS will be edited to reflect this strategy for specific areas.

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0329-29	It is disappointing that the DEIS doesn't address the effectiveness of OHV management options. Limiting traffic to existing trails sounds nice, until you see the actual trail. And when you do see it, "designating" it for further abuse doesn't help any. Trails for ATVS are not a feasible mitigation measure in many places in this area. Areas of mud bog become impassable, which is the reason trails proliferate to begin with. "Stay on trail" signs only undermine the credibility of regulations, where the "trail" is deep muddy water. The Draft RMP/EIS correctly notes "it is increasingly difficult to find a primitive experience and the search for such an experience drives users farther into the backcountry." (pp.167-8) One implication of this is that trying to limit impacts with trail maintenance has limited effectiveness. Nice trails won't offer the primitive experience users are seeking. They'll just expand use farther into the back country. The abuse of OHVs at Tangle Lakes, which was been designated "limited" to OHVs in 1980, is a good illustration of the limits of that management approach. (p.166) So does the failure of state regulations. Powerful evidence that limiting traffic to "existing trails" doesn't work is found on the Gulkana and Delta Rivers. In chapter III, the DEIS explains: "The Gulkana and Delta Wild and Scenic River Corridors carry a "limited to existing trails" designation based on management prescribed in the 1983 river management plans for each river (BLM 1983a; 1983b). This limitation limits cross-country travel, but "existing" trails have never been defined. There are 13 trails that cross the designated wild and scenic river corridors; approximately 50 miles of trail are located within the wild and scenic river boundaries." (p. 166)	This is a major conundrum facing BLM in trail management…how to maintain trails to minimize resource impacts while trying to manage for a primitive or semi-primitive experience and not increasing use by improving the trail. Ultimately the BLM has to balance the public's desire (in some cases) to "leave trails alone" and maintain a primitive or semi-primitive trail experience with BLM's mandate to prevent resource damage associated with OHV use. In some cases, maintaining a higher standard trail will necessitate restrictions (such as weight limits or prohibition on highway vehicles) in order to prevent damage to trail hardening or to maintain a certain recreation experience. Trail hardening projects are expensive; consequently, BLM must prioritize this kind of work based on trail assessment that shows where major resource problems are occurring (such as extensive trail braiding or numerous stream crossings). On some trails, seasonal closure may be considered where boggy conditions exist and there are no options for relocation. There are no easy answers and BLM will utilize input from the public and from the State and Native and village corporations in making these implementation-level decisions.

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0329-30	A "limited" designation is useless without a reliable public inventory of trails. The Draft RMP/EIS estimates there are 1,300 miles of ATV trails in the planning area, only 720 miles of which have been inventoried. We are concerned that "current inventories do not accurately represent all trails that are known to exist on the ground." (p.160) How accurate are they? Why is trails information lacking? Please do the necessary mapping and inventory work.	Page 33 of the Draft RMP/EIS (under Inventory and Monitoring and Implementation-level Planning) shows BLM's commitment to trails inventory and assessment as the first step in implementation-level planning. BLM is committed to this task and is making progress in inventorying all trails. Existing inventory/assessments include location by GPS and assessment of trail and resource conditions. BLM (Glennallen Field Office) has developed a data dictionary to accurately portray existing trail conditions. In summer/fall of 2005, approximately 400 miles were inventoried, adding to the existing information indicated in the Draft RMP/EIS.
0329-31	Rules don't mean anything without enforcement. Enforcement of trails limits will be very difficult, at best. The most important thing you can do to prevent ATV damage while maintaining access is to get more Rangers out on the land. Please hire more rangers. Pay them well. Give them the authority and backing to do their jobs. Let them live in the community—Better yet, hire them from the community.	We agree. Glennallen Field Office, within the last year, hired another law enforcement ranger.
0329-36	Please consider the erosion impacts of motorized boats.	Your concern is not considered in the Draft RMP/EIS because it is very site-specific and because it occurs on navigable State-owned waterways. This specific concern has been and will be considered in the Gulkana management plan revision and in the upcoming Delta River management plan revision (these are implementation-level plans).
0329-38	It is not true that motorized off-road travel is an "unavoidable adverse impact." (p.554) You could close areas and enforce the closures. Thinking about these impacts as inevitable masks the fact that they are a consequence of affirmative actions.	The Draft RMP/EIS recognizes that, even under the most aggressive trails management scenario described in alternative C, it would take time to inventory trails, develop implementation-level plans, mark trails on the ground and post trailheads, and conduct enforcement. In the interim, there would continue to be some off-trail use and some negative resource impacts.

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0331-17	The RMP/EIS lays out many of the impacts of summer OHVs: rutting, trail braiding, thermal erosion, mud bogs, cost of trail maintenance, disturbance of wildlife, destruction of archeological artifacts, conflicts with non-motorized users. The RMP/EIS makes it clear that these are serious concerns. However, all of the alternatives fail to deal adequately with avoiding future impacts. This is because none of the alternatives restrict all summer OHV use to designated trails. Realistically, limiting OHVs to existing trails is not the answer; they must be limited to designated trails. This is because the concept of "existing trails" is unenforceable. A trail created by illegal riders becomes a legal existing trail for riders who come through an hour later. By the Glossary definition, an existing trail has not been inventoried, so the BLM cannot prove that no trail existed prior to a given rider's use. Furthermore, existing trails are often poorly sited with respect to wet areas, so they continue to braid and widen. Some may also be poorly sited with regard to fish habitat and to vulnerable, easily disturbed wildlife.	Please see our response to comment 0331-18 and 0312-73 regarding enforcement.

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0331-18	Alternative C, the best of the alternatives offered, limits summer OHVs to existing trails on 48% of the land and to designated trails on another 48%. The rationale for allowing existing trail use is that the lands have been selected by the State and/or Native corporations. This is not a logical position. Final disposition of lands is still some years away, while OHV use continues to expand. If the lands end up being retained in federal ownership, they will be in a more degraded condition. The cost of repairing damage will be higher to federal taxpayers. It will be harder to keep riders away from the expanded number and length of trails. For those lands that pass into Native ownership, the problems will be similar.	Thanks for the comment. BLM feels that the strategies presented in alternatives C and D for OHV management on selected lands is logical for the following reasons: a) It represents a significant change from the status quo and sets the stage for more proactive management of OHV trails; b) we cannot possibly afford inventory, designation, marking, maintenance, and enforcement on 1,300 miles of trail so logically the emphasis occurs where we know we will retain the land; and c) this strategy allows us to be more proactive in interim management if desired by the selecting entity (for example, Ahtna has expressed the desire to work with BLM on trail limitations on selected lands to protect cultural sites).
0331-19	The specific mention of snowmachine impacts is scarce and brief. The glossary definition of OHV does not specifically mention snowmachines, nor does the definition of snowmachine say that it is a type of OHV. Page 434 says, "OHVs (including snowmachines) can adversely affect wildlife populations," but most discussions of OHV impacts address summer impacts. We could not find specific discussion of snowmachine impacts on water quality and air quality (two-stroke emissions), visual resources or subsistence. Given the vast and increasing use of snowmachines, this is a serious omission.	Page 366 of the Draft RMP/EIS states "For the purposes of this document, OHVs include snowmachines. However, most impacts described in this analysis result from OHVs used during snow-free months. Where impacts are specific to snowmachines, they are described as such." Discussion of snowmachine impacts is not lengthy because Alaska-specific data on snowmachine impacts is lacking. BLM is currently involved in funding research on predator/prey relationships in Unit 13 and effects of snowmachine tracks on these relationships. Within the Draft RMP/EIS, BLM leaves the door open for future snowmachine management, based on locally gathered information (see page 33, Inventory and Monitoring and Implementation-level Considerations under Alternatives C and D, pages 35-50, Draft RMP/EIS).

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0331-20	We support the snowmachine closures in alternative C, but these closures are far from adequate for resource protection and far from a fair allocation to non-motorized users. It appears that none of the alternatives closes areas along the Glenn Highway, Tok Cutoff or Denali Highway to snowmachine use. We request more closed areas.	Please see response to comment 0006-6.
0333-1	I don't want BLM to close all access to ORV users - but common sense should prevail - these lands and trails cannot sustain this type of use. In my thinking management of the trails should be a priority. Harden the trails that can be hardened, close others to vehicles according to weight, season of the year, etc. If trails are managed correctly, it can help protect critical wildlife habitat, protect watersheds and sustain the land for everyone to enjoy.	We agree and feel that this balanced approach is represented in the Preferred Alternative (Alternative D) for Travel Management. See pages 32-50 of the Draft RMP/EIS.

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0334-2	The Augustana Creek drainage and the Canwell and Castner Glacier drainages (not JUST the glaciers, the whole drainages) are some of the most beautiful and wild areas accessible from the road for wilderness human-powered travel. Many other places are accessible by 4-wheeler and snow machine that are just too far for weekend human-powered trips. Motorized vehicles have the entire area on the south side of the range. The areas I have mentioned above (the three drainages) should be preserved for their wilderness qualities of quiet and lack of noise and air pollution for those who prefer the benefits of human-powered travel. The use of this area for human-powered purposes does not favor a small group of people; it would be enjoyed by people across the community and political spectrum. Many skiers and mountaineers in Alaska use these areas in the winter time, including people from various parts of the community, from the university to the military bases. It is a rare activity which brings these often segregated parts of the community together. In addition, as skiers and mountaineers, we have come across an alarming number of snowmachiners gravely ill-prepared for glacier travel. Increased use by ill-prepared people could be a safety hazard. … [T]he Augustana Valley is a great length of ski in to a base camp for a second day of wilderness back country skiing with a truly wilderness feel, and not too far from the road. There are not many places like this left. Please leave this little creek valley free of the noise and pollution of machines.	Alternatives C and D of the Draft RMP/EIS would manage the Augustana drainage as non-motorized (C is year-round, D is winter non-motorized). Motorized (snowmachine) access would be allowed for subsistence hunting. See also the response to comment 0346-3. Under Alternative D of the Proposed RMP/Final EIS, PLO 5150 would be modified to allow conveyance to the State of 83,000 acres within the pipeline/utility corridor. This includes portions of the Augustana Glacier. Consequently, the Augustana Glacier is not included as part of the Delta Mountains sub-unit in Alternative D of the Proposed RMP/Final EIS. The McCallum Creek drainage, however, is included.

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0336-1	Please consider my input regarding the management of 7 million acres of Federal land in eastern Alaska ...Please keep ALL of this land closed ENTIRELY to motorized off-road vehicles.	Thanks for the comment, but this would be inconsistent with BLM's stated goal to provide access to public lands (page 32, Draft RMP/EIS). The Draft RMP/EIS does consider an alternative that would close 281,000 acres to motorized use.
0337-2	I have some concerns that some of the little known / lightly used trails are not being recorded. Some of the trails in the Alaska East plan have a long history of use with little if any maintenance. These trails in some cases have 50 to 100 years of use, with little or no maintenance. It is unfair to point at them as environmentally distressed areas. Concerns about trail damaging sensitive areas will need to be address with proper maintenance as you would with any valued asset.	We agree that accurate and up-to-date trail assessment and inventory is necessary before trail designation can occur.
0338-1	Please put restrictions on use of off- road vehicles. Roads are for driving on. Roads are built to take the beating. The public lands belong to all Americans, and when one use ruins it for another use, this is wrong. Designated trails would concentrate the vehicles along certain paths and leave more of the country free of tracks., which is of value to a great part of the public.	Alternatives C and D would place some restrictions on use of OHVs on BLM-managed lands.
0339-1	[I] … oppose only 0.6% of the land closed to motorized ORVs. Not everyone in this state likes ORVs, some like myself moved here for pristine beauty, solitude, and wilderness.	Alternative C analyzes proposals for closure of 281,000 acres to motorized use.

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0339-3	ORV activity has been shown to damage important land ecosystems as there is considerable damage and issues that are taking place in the deserts of the Southwest as a result if unlimited ORV use. Why can we not be more proactive in our thinking as to avoid such damage to fragile tundra which is already under enough environmental stress. I strongly urge those in the decision making process to take more into account than just money and profit.	Please see response to comment 0340-1. And there is no "money and profit" derived by BLM from any course of travel management described under any alternative considered in the Draft RMP/EIS.
0340-1	Please consider closing more area in the management planning area in eastern Alaska to … off-road vehicle use. The off-road vehicle use is particularly damaging to much of the very sensitive habitat in the planning area, and to limit to designated and existing trails will not stop or even slow the progress of habitat degradation such use is doing. Non motorized recreational uses are displaced and wildlife is endangered by the widespread and growing (mis)use of the vehicles, and w/ little resources for enforcement of the weak proposed restrictions on the use of off-road vehicles, there will be more and more damage.	BLM feels that the travel management proposals under the Preferred Alternative (Alternative D) represent a balance, given the public comment throughout the planning process. These proposals set the stage for a more proactive OHV management program, one that no longer condones wide-open OHV use. This represents a significant change from the status quo. Alternative C considers more areas closed to motorized use (281,000 acres) and more area-wide restrictions on OHVs.
0341-8	The option to allow use of existing but illegal trails is unconscionable. Trails that were established illegally should be closed, and legally established trails should be monitored to prevent expansion and braiding of the trails.	Currently, all BLM-managed lands in the planning area (with the exception of Tangle Lakes Archeological District and the Delta and Gulkana river corridors) are managed as open to OHVs, meaning cross-country travel is permitted. Thus, the only existing "illegal" or unauthorized trails are in TLAD. Alternatives A and B would continue this management, C and D would change it.
0341-9	Weight restrictions should also be a part of the prescriptions for OHV/ATV management.	Please see response to comment 0164-17 regarding weight limitations.
0344-1	I know that some development will probable have to occur but I hope that more than .6 % of that beautiful area is left for non-motorized use.	It will be, whether it is regulated or not. Please recognize that 63% of the area currently provides a primitive recreation experience, with little to no motorized use. Much of this area is this way because of limitations to motorized use from topography, wetlands, or dense vegetation. This is not likely to change under any alternative.

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0346-3	More areas need to be dedicated to non-motorized recreation: 0.6% is not enough! Interior Alaska faces a shortage of accessible recreational opportunities for quiet, human powered recreation. I appreciate that you selected two drainages in the Alaska Range for non-motorized recreation; however, we also need somewhere not too far from the road to ski where there is snow. Please add the McCallum Creek drainage to non-motorized status. Gulkana Glacier is overrun with snowmachines - we need a quiet place to ski, where we won't face snowmachines cutting up all the powder snow and starting avalanches above us.	Based on public comment BLM's goal for the area to maintain a primitive recreation experience, BLM has added the McCallum Creek drainage to the seasonally non-motorized areas considered in alternatives C and D in the Proposed RMP/Final EIS (pages 70 and 73).
0354-22	Some assumptions in the RMP are incorrect and unrealistic, and a plan based on inaccurate assumptions is doomed to failure, such as: "5) Unmanaged proliferation of trails will be maintained." The Bureau of Land Management is bound by ANILCA to minimize damages to private lands and t he damages on 17(b) easements. "Reasonable access" must be defined in a manner that does not continue to harm private lands.	We cannot find the quote that you refer to. Page 363 of the Draft RMP/EIS states "unmanaged proliferation of OHV trails will continue on accessible State-managed lands." We maintain that this is a reasonable assumption. Without specific citations from ANILCA, it is difficult to respond to your comment. The 43 CFR 2650.4-7 and ANILCA section 903(a)(1) states that 17(b) easements "should be designed so as to minimize their impact on Native life styles, and on subsistence uses." These requirements are followed when BLM identifies Sec. 17(b) easements for reservations in conveyances to Native corporations. Comments from the Native corporations, other federal and state agencies and the public are requested and considered in the easement identification process. Decisions made during the easement identification and conveyance processes are beyond the scope of this planning process.
0354-35	Protect streams from OHV use, restore ecosystems to original condition. Build bridges or limit to foot traffic. … Environmental damage could be mitigated by finding alternative routes and engage in land exchanges to consolidate management tracts.	BLM's management intent for OHVs, as described in the Preferred Alternative (Alternative D), is to set the stage for proactive management and maintenance of OHV trails, rather than the unmanaged proliferation of trails. In implementation planning, designated trails can be selected and located based on long-term ability to minimize resource impacts. Specific restrictions (such as weight limitations) on specific trails may be considered based on specific resource concerns. These implementation-level considerations are described on pages 33-50 in the Draft RMP/EIS and could be altered or improved based on public involvement and coordination with the State and Native corporations.

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0357-2	There is so much evidence that restrictions are for sure needed for these technologies, that Chitina Native Corporation supports the portions of alternatives C and D that would place those badly needed limitations and restrictions to OHV and ATV uses on public administered lands.	Thanks for the comment.
0379-4	And all these ATVs, I think there's got to be a limit on the weight restriction on that because you get them--I don't know why you would need a bigger motorized vehicle than a small ATV, anything over 1,500 does big time damage to the land, trees, I mean it just--I don't have an ATV, I can't afford one.	See response to comment 0164-17 regarding vehicle weight limits.
0381-3	In short, our view in regards to trail management is that we urge BLM to adopt a more active role in regards to not just management but overall control.	We agree, and believe this philosophy is reflected in the Preferred Alternative (Alternative D).
ACCESS (17B EASEMENTS, R.S. 2477S)		
0010-7	We don't want uncontrolled access to rivers, streams, it affects our fish and wildlife habitat. I think we need to tell BLM that we need to look at this issue before we give access say into an area where many streams are crossed and many moose and caribou habitat areas, you know, so that you don't affect the migration of the caribou or the moose or where they pass through, you don't scare them off.	Decisions made in this RMP will not affect existing 17(b) easement reservations as recorded in conveyance documents. See response to comment 0354-22. These issues were discussed prior to reservation of the easement. Most of the lands presently owned by the Native corporations in the Ahtna region were conveyed in the 1970's and 80's. At that time, village meetings were routinely held with the Native corporations to discuss the draft easement memorandum and draft decision to issue the conveyance prior to finalizing the documents. Native comments such as adverse impact to Native culture and subsistence needs and duplicative access routes resulted in many proposed easements not being reserved in the conveyance to the Native corporation.

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0016-3	I do believe a certain area has to be regulated some way because it's getting where under 17(b) easements that, you know, they have these easements and what happens is when they make a trail through there, they just keep getting wider, going around and pretty soon it's a mile wide in some areas. And if you're going to have regulation in there, I think the BLM should have some kind of enforcement, you can't just make regulation and just have everybody run all over the place. So I agree with some kind of restriction but not totally.	The Draft RMP/EIS, under Travel Management, Transportation and Facilities, 17(b Easements (page 162) has been edited to include a segment on BLM's legal responsibilities for 17(b) management including enforcement. See pp. 41, 42, and 187 of the Proposed RMP/Final EIS.
0020-12	The biggest conflict we have, I think, tends to be over access. 17(b) has to be reworded or reworked with the Native Corporations to where somehow all of our lands are protected. It must be done in accordance with all applicable laws and regulations. I cannot state that enough. Your policies and guidance is really needed in this. It is your job to provide guidance on these access issues. I encourage you guys to tell Congress that it's created a really hostile environment, socially, economically and guess what, now, our subsistence is in danger.	Glennallen Field Office is committed to working with Ahtna, Inc. on a 17(b) easement implementation plan and State and other federal agencies and the public will be consulted during the process. The Proposed RMP/Final EIS provides guidance that will give the Field Office discretion to provide education and perform maintenance on specific easements, based on the priorities listed on page 41 of the Proposed RMP/Final EIS and available funding. The Proposed RMP/Final EIS also clarifies BLM's legal responsibilities on 17(b) easements (pp. 41, 42, 187). This RMP cannot amend or re-word ANCSA.

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0020-27	BLM in its own words manages the fish and wildlife habitat, but the lack of the management on the easements from BLM and the State of Alaska, by the way, has not prevented any harm to any of these habitats. Our moose and caribou populations suffer from the destroyed habitat and encroachment from increasing numbers. We have indirect damages, especially to our spawning areas. We have contaminated soils from the accumulation of debris and fecal matter on our private lands. Mentasta is the headwaters to the Copper River. We can prove contamination in our streams and guess what, it's making its way all the way to Cordova. We have increased litigation costs from all this trespass and, of course, decreased resources available to our people on our lands. The cumulative impacts include our continuous loss of artifacts, vandalism, ecological damage, dump sites, assumption of rights by non-shareholders and increased costs for posting trespass and litigation.	The Draft RMP/EIS states that "realignment of 17(b) easements would be considered with the cooperation of the land owner on lands already conveyed." Where documented resource damage is occurring, including damage to fish habitat, BLM will, in consultation and cooperation with the land owner, State and other federal agencies and the public., consider re-location of the 17(b) easement or maintenance of selected areas, based on the priorities listed on page 34 of the Draft RMP/EIS. These actions are discretionary and will be contingent on funding approval.
0080-4	Further be it resolved, the Southcentral Regional Council recommends that the BLM take more active leadership in resolving problems with 17(b) easements, including trespass off of 17(b) easements, degradation of 17(b) easements, and failure by the BLM to enforce regulations. BLM should improve identification of easement boundaries, repair damage to easements and work with neighboring land owners to establish better consistent management standards between neighboring land owners.	The Draft RMP/EIS, on page 34, allows for BLM to participate in 17(b) easement maintenance and education, based on priorities listed on page 34. BLM's responsibilities for enforcement on 17(b) easements is explained in the response to comment 0379-3. This language and other clarification of BLM's responsibilities for 17(b) easements, under the law, has been added to the Proposed RMP/Final EIS (pp. 41,42, 187). Glennallen Field Office is committed to working with Ahtna, Inc. on a 17(b) easement plan.
0164-6	BLM needs to post land ownership changes along the easement.	See response to comment 0020-12 and 0020-27. Your suggestion would be a helpful educational tool on high-use easements.

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0164-7	A trail management implementation plan should be developed for the management of 17(b) easements cooperatively between Ahtna Inc. and the BLM.	We agree. This has been added to the Management Common to all Action Alternatives section of Travel Management in the Proposed RMP/Final EIS (page 41, 42).
0164-8	Appropriate timelines need to be put in place for the relinquishment of 17b easements. Ahtna requests BLM to reevaluate the previously submitted 17b easements relinquishment list submitted by Ahtna for reconsideration. See Appendix A.	Termination of easements will not be considered as part of this RMP process. According to regulation (43 CFR 2650.4-7(a)(13)) BLM can terminate an easement if it was a) proposed at the time of conveyance; b) wasn't used by December 18, 2001; c) doesn't access isolated public land, or d) is no longer needed. Based on these criteria, it was determined in a public process in 2001 that none of the existing easements would be terminated. This does not preclude possible terminations in the future where a sec. 17(b) easement no longer accesses publicly owned lands or a duplicative route is acquired/dedicated for public access.
0164-9	17b easements should be identified by the National Park Service, National Forest Service, and Bureau of Land Management through on the ground inventory. A cooperative agreement should be made between BLM and Ahtna Inc. to identify 17(b) easement and to work together to monitor the impacts of ATVs and other off road vehicles on designated trails.	We agree.
0164-10	Ahtna requires a cooperative agreement with BLM to actively address travel management, trail degradation, trespass issues concerned with 17b easements, crossing of anadromous streams, education of users on land status, reparation of damages currently on the landscape to Ahtna lands.	BLM agrees that such a cooperative agreement is needed. See our response to comment 0164-7.
0164-11	It is the BLM's responsibility to inventory and maintain 17b easements and obtain input from those affected by the management of those easements. BLM is not currently doing this and Ahtna demands this to occur immediately.	The Proposed RMP/Final EIS includes clear direction on BLM's responsibilities on 17(b) easement management, according to the law (pp. 41, 42, 187). It also includes language (page 41, 42) that shows BLMs intent to work with Ahtna on specific trail maintenance and inventory, based on the listed priorities. Prioritization is necessary because these are discretionary actions, dependent on approval and funding.

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0164-14	State-recognized RS2477s need to be evaluated for their validity and relinquished. Ahna Inc. does not recognize RS2477 rights of ways on their land. If there is an assertion of an RS2477, it should comply with the original purpose of the law.	Assertions of R.S. 2477 routes will not be made as part of this planning process.
0164-21	Section line easements are not addressed in this plan and Ahtna Inc. does not recognize them.	On state owned land or lands acquired from the State, easements for public highways may exist along section lines. This RMP addresses management of BLM-managed lands, not state lands, so does not address section line easements.
0164-71	All 17b easements should have a 1500 lbs. weight limit imposed on them.	Vehicle weight limits were established during easement reservation and are described in the conveyance document. For easements reserved as 25 foot trails, there is an existing 3,000 lb. gross vehicle weight limit for OHVs. Existing easement reservations, as described in the conveyance documents, will not be changed as any part of the decisions made in this RMP.
0175-12	Page 34, Paragraph 3. Please revise the first sentence to read; “To date, the State of Alaska has determined that approximately 650 RS 2477 routes throughout the State satisfy the requirements of RS 2477; the State continues to research additional routes." In addition please change the second sentence to reflect the fact that the current policy is a Department of Interior policy that is outside the scope of this plan.	Your first sentence change will be made in the Proposed RMP/Final EIS (page 42). The second suggested change is already noted in the third sentence: "Land use planning decisions do not affect valid R.S. 2477 rights or future assertions…"
0175-18	Pages 37 and 43, Delta WSR Corridor Area, Implementation-level Considerations. The Delta Wild and Scenic River is a conservation system unit under the ANILCA definition in Section 102(4), thus subject to the access provisions of Section 110(a) and Department of the Interior implementing regulations at 43 CFR Part 36.11. We request the plan provide clarification that the Bureau must complete regulations under the closure procedures in 43 CFR Part 36.11 before limiting snowmachines to designated trails within the Wild and Scenic River Corridor.	These procedures would be followed as a part of implementation level planning. Limiting snowmachines to designated trails is discussed under “Implementation level considerations” for alternatives C and D. These considerations are presented to display BLM’s management intent but could change based on public involvement and comment during implementation level planning.

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0253-2	Easements should be reserved on all existing trails after they have been inventoried.	No easements are necessary if lands are to be retained as public lands. Reservation of new easements or extending reserved easements will be considered as public lands are conveyed to Native corporations.
0312-94	Identification of potential rights-of-way does not establish the validity of these claims nor the public's right to use them. In the absence of specific regulation or law, the validity of all RS 2477 rights-of-way should be determined on a case-by-case basis, either through the courts or by legally binding agreement of all landowners. We recommend that the BLM use discretion in evaluating the validity of each RS 2477 claim in the planning area. It is imperative that the routes are surveyed prior to processing.	Please see response to comment 0329-39 on R.S. 2477s.
0312-95	We recognize that there are many concerns held by adjacent private land owners, primarily Ahtna Inc., related to trespass and ANCSA 17(b) easements, as well as cumulative impacts on hunting and access issues. We support any efforts the BLM makes to address these concerns.	Thank you. As stated, Glennallen Field Office is committed to working with Ahtna, Inc. on implementation of a 17(b) easement plan, utilizing direction provided in this RMP.
0312-96	We recommend that the Proposed RMP/Final EIS adhere to the coordinated strategy to locate, identify and proactively manage 17(b) easements as established by the BLM Section 17(b) Public Easement Program. This includes prioritizing enforcement. We agree with the criteria and goals put forth in the BLM Resource Advisory Committee Resolution of February 18, 1999.	The Proposed RMP/Final EIS will clearly define BLM's legal responsibilities on 17(b) easement management (pp. 41, 42, 187). It will allow for Field Office discretion in working with Ahtna, Inc. on education, maintenance, marking, and re-location of specific easements, based on priorities listed in the Proposed RMP/Final EIS (page 41). Implementation of these actions will be subject to approval for funding.
0326-1	Access restrictions resulting from the adoption of both Alternative C and D will not allow traditional means of access to continue on portions of public lands in the EARMP area and therefore are not supported by the AOC. [Alaska Outdoor Council]	The Draft RMP/EIS states (page 34) that all proposals for OHV management considered below (including alternatives C and D) would be consistent with section 811 of ANILCA. BLM will also comply with Section 1110 of ANILCA in management of the Delta and Gulkana Wild and Scenic River corridors.

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0326-5	The AOC believes management of recreational opportunities and the conservation of natural resources values in the EARMP area can be achieved without unnecessarily restricting traditional activities and means of access that have been specifically provided for in ANILCA. Currently, State and Native lands within the EARMP are adequately being managed under a number of plans; the Copper Basin Area Mgmt. Plan (Dec. 1986), the Susitna Area Mgmt. Plan (June 1985), and the Nelchina Public Use Area. The AOC will not support any management alternative that is more restrictive than these plans or the state's "Generally Allowed Uses on State Land" policy.	The Draft RMP/EIS (page 34) clearly states that BLM will comply with ANILCA in its implementation of the Travel Management decisions made in this RMP. The BLM worked closely with the State and researched the State's DNR Area plans early in the planning process, to ensure consistency in management direction, particularly on State-selected lands. The BLM worked closely and carefully with the State to develop a strategy, on State-selected lands, that would set the stage for more proactive trails and OHV management and still be consistent with existing State statutes.
0329-39	Please don't recognize RS 2477 easements, or rely on them to provide public access. RS 2477s don't, in fact, provide public access. What they do is preclude meaningful conservation—they are a wrench in the gears of federal conservation units.	The Draft RMP/EIS states (page 34): "The State of Alaska recognizes approximately 650 R.S. 2477 routes throughout the State. The assertion of these routes has not been recognized and current BLM policy is to defer any processing of R.S. 2477 assertions except where there is a demonstrated and compelling need to make a determination. Land use planning decisions do not affect valid R.S. 2477 rights or future assertions." Decisions made in this RMP will not affect recognition or assertion of R.S. 2477 routes.
0329-40	It is good that BLM is maintaining access with 17(b) easements. Please don't terminate any 17(b) easements, even if they're not being used right now. Alaska is being locked up by privatization of the land.	It is BLM's goal to maintain access to public lands. Please see response to comment 0164-8.
0329-41	It is unclear how maintenance and management of 17(b) easements will "improve" under all action alternatives. (p. 434) If it were that simple, it would have been done already. Vowing to do better doesn't necessarily work. How will management of 17(b) easements improve?	Through a cooperative 17(b) easement plan being developed with Ahtna, Inc. as mentioned in the response to comment 0164-7. Management direction common to all alternatives (Draft RMP/EIS, page 34) allows BLM discretion to utilize education and some maintenance, on selected 17(b) easements, based on criteria as described.

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0354-1	If right-of-ways [17(b) easements] cannot be controlled or maintained, they must be relinquished.	Termination of easements will not be considered as part of this RMP process. According to regulation (43 CFR 2650.4-7(a)(13)) BLM can terminate an easement if it was a) proposed at the time of conveyance; b) wasn't used by December 18, 2001; c) doesn't access isolated public land, or d) is no longer needed. Trespass or maintenance issues are not adequate justification for termination.
0354-3	Of the 1,300 miles of trails that exist in the planning area, those 17(b) easements that cross Native-owned or Native-selected lands must have "trail management implementation plans" or be relinquished, not just extended or reserved. The implementation plans must include reparation in accordance with ANILCA Sec. 1107(a)(2) "requirements for restoration, revegetation, and curtailment of erosion of the surface of the land" and Sec 1107 (a)(4) "requirements, including the minimum necessary width, designed to control or prevent (A) damage to the environment (including damage to fish and wildlife habitat), (B) damage to public or private property, and (C) hazards to public health and safety;" Sec. 1107 (a)(5) "requirements to protect the interest of individuals living in the general area of the right-of-way who rely on fish, wildlife, and biotic resources of the area for subsistence purposes;" and Sec 1107(a)(6) "requirements to employ measures to avoid or minimize adverse environmental, social, or economic impacts.". BLM is not in compliance with these issues in the Ahtna area.	As noted in our response to comment 0164-7, we agree that a cooperative agreement is needed for 17(b) easement management. Title 11 of ANILCA and specifically section 1107 deal with rights-of-way across public lands that access or cross Conservation System Units. BLM will comply with 1107 in consideration of right-of-way applications or right-of-way management within CSUs (the Delta and Gulkana wild and scenic rivers are the only BLM-managed CSUs in this planning area). However, Title 11 and section 1107 does not apply to 17(b) easements.

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0354-4	Due to the considerable damage to Native-owned private lands, alternative routes with less negative impacts on streams are available and must be considered in accordance with ANILCA Sec. 201(1)(d)(ii) "the environmental and social and economic impact of the right-of-way, including impact on wildlife, fish and their habitat, and rural and traditional lifestyles including subsistence activities and measures which should be instituted to avoid or minimize negative impacts and enhance positive impacts".	Please see response to comment 0020-27 regarding re-alignment of 17(b) easements. Title II of ANILCA deals with establishment and management of new additions to the National Park System. Your specific citation is for consideration of rights-of-ways within Gates of the Arctic National Park. This does not apply to BLM's management of 17(b) easements.
0354-19	Some assumptions in the RMP are incorrect and unrealistic, and a plan based on inaccurate assumptions is doomed to failure, such as: "2) Access to private lands will decrease as land entitlements by Native Corporations are fulfilled." People already assume access rights on conveyed land that "claim 20+ years of use", which creates more conflict.	BLM stands by its assumption. As conveyance of Native-selected lands occurs, it is doubtful that all existing trails (including non-easement trails) will be maintained as easements in the conveyance documents.
0354-24	BLM's management policies must reflect more oversight on: 2) Education of the public and trail monitoring for unauthorized usage.	Page 34 of the Draft RMP/EIS identifies education as a discretionary action. BLM will consult with the landowner to identify educational opportunities, based on the priorities listed. It also states that BLM will continue to monitor use on 17(b) easements.
0354-25	BLM's management policies must reflect more oversight on: 3) Research means of rerouting right-of-ways to protect adjacent lands.	The Draft RMP/EIS considers a range of alternatives that evaluate different areas for right-of-way exclusion or avoidance, based on specific resource concerns (pages 107-109).
0354-29	Actions for BLM-managed lands must include: 2) Research alternative routes to protect anadromous streams and Native allotments crossed by 17(b) easements.	Page 34 of the Draft RMP/EIS states "Realignment of 17(b) easements would be considered with the cooperation of the land owner."
0355-12	All 17(b) access routes should be identified by name and number.	They are. This is done in the conveyance document and Glennallen Field Office maintains an atlas with the mapped location, name and number of most 17(b) easements which is a public document and can be requested. Because of the large number of easements and the ability for anyone to obtain a copy of the list, we have not included a list of them in the Proposed RMP/Final EIS.

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0355-20	[U]nder ANILCA there are rights of access that cannot be adversely impacted by this EARMP. Those rights for road construction across WSR corridor should be explained in the EARMP to ensure all parties know that such rights exist as valid existing rights for access to State land, Native allotments, Native lands, and other existing rights. To not include this in the EARMP will result in major problems for projects that will require such access and for BLM to amend the EARMP when the need for such access arises. Now is the time to address this issue and include the ANILCA access rights clearly in the EARMP.	In the Proposed RMP/Final EIS, a paragraph has been included in Management Common to All Action Alternatives under Travel Management on page 42 summarizing access requirements under ANILCA. ANILCA insures "adequate and feasible access" to inholdings and valid existing rights. However, a transportation system crossing a Wild and Scenic River corridor is subject to consideration of impacts to the outstandingly remarkable values as well as consideration of alternative routes or modes of transportation. Construction of such a route is not a guaranteed "right" under ANILCA. See 43 CFR 36.1-36.9.
0355-26	In all other specific areas listed there is not justification for the access restrictions. If BLM proceeds and includes such restrictions, the EARMP should state clearly in each that ORV access for mineral exploration is allowed.	Justification has been provided for any access restrictions in the Proposed RMP/Final EIS.
0357-4	The access the public gains through 17 (b) easements was another area we have always had great problems with. With this plan, we would like to see the development of a easement management plan for the entire area the plan covers. We fully understand the purpose behind reservation of these public access routes, we do not support the lack of management plans and the little or no presence made by those who are administratively responsible for the publics proper use of these trails, roads, and sites. And when violations are located of the easements and damage occurs, restoration and fines for the damage should be sought by those who caused the damage in the first place.	Please see responses to comments 0379-3, 0381-2, and 0020-12.

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0375-6	There's also the issue of 17(b) easements and trespass. BLM had lots of money to plan and identify 17(b) easements and to put them into conveyances to the various ANCSA corporations but they haven't put any money into manage and enforce and prevent trespass by people using these easements. I heard one of the Board members suggest that it's up to the corporation to prevent trespass, it takes money, it takes personnel, it's not an easy matter to prevent trespass over a million and a half acres. The 17(b) easements were not placed there by the Native tribes, they were not placed there by the regional corporations, they were placed there by BLM in attempting to identify easements for the public, and these are the easements that the public are using and you've heard people testify at length about damage to the lands caused by use of easements. And even if they're lawfully on the lands and using an easement that is a legal easement damage to the land has to be prevented and it's got to be managed and it's got to be repaired where it happens. And if BLM is going to identify the easements and encourage the use of the easements, then you should likewise prevent trespass, repair them, identify them and force the rights that private land owners should expect in using the easements.	Please see responses to comments 0379-3, 0381-2, and 0020-12.

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0379-3	And on easements, that's not enforced. Like people testified ahead of me, that if the trail is too muddy and they can't go through there, they'll just make another new trail, to go around, and these easements aren't enforced. And like somebody else said if I did that to somebody else's property I'd probably end up in jail or getting shot.	The Draft RMP/EIS (page 34) allows for BLM to participate in 17(b) easement maintenance (which, in some cases, would reduce trail braiding and help easement users to stay on the easement), based on priorities listed on page 34. Regarding enforcement, BLM has only a non-possessory interest in a reserved easement, which is the right to use the land for a specified purpose. This does not allow BLM to take civil or criminal action against uses, such as wandering from the easement, camping more than 24 hours or fishing from the easement, when the uses do not interfere with the retained rights (the use of the easement). This information will be added to the Proposed RMP/Final EIS, as noted above (pp. 42, 187).
0381-2	The plan reflects BLM's involvement in the management of easements, specifically as it refers to 17(b). However, this management authority seems only temporary or rather incidental. Essentially there is no management of easements and if it were so, easements would be posted, identified and marked. Trail management plans would have been implemented through possible cooperative agreements as mentioned. Enforcement of ANILCA mandates, as in Section .810 and .1107, would have already been in place and implemented and so forth.	The Draft RMP/EIS has been changed to provide a clear description of BLM's legal responsibilities in easement management (See pp. 42, 187 of the Proposed RMP/Final EIS). Some of the items you mention have been done, such as easement identification and marking. It is important to understand (and it will be made clear in the Proposed RMP/Final EIS) that BLM's responsibilities for 17(b) management under law are limited to record keeping, identification and reservation, and termination of easements. Beyond that, all easement management (including locating and marking) is discretionary and subject to availability of funds, personnel and approval.
0381-4	Finally, we urge BLM to reflect in the plan, that State claimed RS-2477's for instance, be evaluated for validity in that it complies with the original purpose for which it was written. We go further to state that we do not recognize RS-2477's as being applicable to Native lands in general. The same would apply to section line easements as asserted today by the State.	Please see responses to comments 0329-39 on R.S. 2477s and comment 0164-21 on section line easements.
0382-1	So the 17(b) easements need to be managed in a, like, you know, for any land managers to have any kind of easement program, they need to enforce their policies and, you know, protect the land owners.	BLM's responsibilities for enforcement on 17(b) easements is explained in the response to comment 0379-3. This language will be added to the Proposed RMP/Final EIS for clarification (page 42).

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0386-4	[T]he 17(b) easements have created -- like Roy Ewan testified, has created an influx of people on private lands, specifically AHTNA lands. And that under the plans, you know, the 17(b) easements is encouraging people to access that to different places that the Federal has a responsibility for facilities, bathroom, trash pickup and things that are happening along these access places.	Please see response to comment 0312-96.

2. RECREATION

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GENERAL RECREATION MANAGEMENT		
0006-1	This plan addresses a host of important issues, but perhaps none more important than the management of motorized recreational vehicles and the protection and restoration of the Natural Soundscape. Natural quiet and the opportunity to hear and enjoy natural sounds have until recently been taken for granted. No one would have thought a decade or two ago that it would become nearly impossible on so many of our public lands for both people and wildlife to find quiet refuge in the backcountry.	The Draft RMP/EIS considers a range of alternative proposals that would manage for non-motorized areas, including consideration of 281,000 acres in Alternative C and 44,000 acres in Alternative D, as well as consideration of specific trails that would be managed as non-motorized. In its' Recreation Opportunity Spectrum inventory, one of the considerations was "sights and sounds of the road system". Within areas that offer a primitive recreation opportunity, sights and sounds of the road system are nonexistent. These areas currently constitute 63% of BLM-managed lands within the planning area.
0006-9	Flightseeing in the basin is likely to grow, and it can become a serious problem to those on the ground. Although at the present time overflights cannot be regulated by the BLM, landings can be. Flightseeing should be regulated wherever possible by attaching provisions to landing permits which minimize the impacts to those on the ground. Provisions can include, in addition to designated where landings can occur, no flight zones and designated flight paths to protect wildlife as well as people, curfews (for example, no flights between the hours of 6 p.m. and 9 a.m.), and restrictions on the number of flights.	The Draft RMP/EIS identifies, in Alternatives C and D, specific areas where commercial recreation use limits (including flightseeing) would be established, based on objectives identified in the RMP. In addition, specific areas are considered that would exclude heli-skiing, based on maintenance of existing primitive recreation opportunities (see pages 58-64, Draft RMP/EIS).
0035-3	I hunt on the north side of Jack Bay for goats and I've watched helicopters from the heli-skiing outfitters pass back and forth along the cliffs and actually watched goats flee from the helicopters and kick off small avalanches ... And I've also seen helicopters come zooming along down at tree level on the SouthFork of the Neamhoff River when black bear -- or	Glennallen Field Office staff monitor permitted helicopter supported skiing activities on BLM-managed lands in the Valdez and Tiekel River areas. One facet of this monitoring is identification of critical Dall sheep and mountain goat habitat. Within these critical areas, helicopters are not permitted to land and are required to maintain horizontal and vertical distances from goats and sheep. The Draft RMP/EIS, Required Operating Procedure F&W-b-6, page 615, describes stipulations that would be applied to all operations.

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	brown bears are just coming out of hibernation during late April, early brown bears, and that sort of thing is very hard to regulate so I think the best idea is just to keep heli-skiers out of some of that country. They've got lots of country to use along the Richardson Highway, the State lands, I believe is all open to heli-skiing, and so I would strongly urge in the interest of goats and brown bears, in particular, and recreationists also to try to keep that area as free from motorized use as possible.	
0070-3	I'm always up for a few public use cabins perhaps on some of the trails you have along the Denali Highway, maybe put a few in, 10, 12 miles back, something that snowmachiners can use, something that hikers, bikers, whatever, multi-use trails can use.	Alternatives B and D in the Draft RMP/EIS both consider public use cabins in the Denali Highway area (pages 57 and 62).
0084-7	I also support designating the five Special Recreation Management Areas presented within the draft plan in hopes that BLM will recognize the sustainable, long-term economic and social values of responsible, low impact recreation activities on these public wild lands.	Thank you for your comment. SRMAs are considered for designation as outlined in the Draft RMP/EIS on pages 58-64.
0097-1	AQRC [Alaska Quiet Rights Coalition] supports Alternative C, instead of the Preferred Alternative D, due to the greater opportunities offered for quiet recreation in backcountry or primitive settings. Alternative C designates that more area be included within Special Recreation Management Areas (SRMA) and thus more lands will be managed to maintain backcountry non-motorized recreational opportunities.	You are correct. Thanks for the comment.
0164-29	Ahtna Inc. is against the development of a public cabin system but would like to see current cabins that are not in trespass remain in place for emergency purposes.	Thanks for the comments. A range of alternatives is considered for public cabins in the Draft RMP/EIS, including no public cabin system (Alternatives A and C).

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0164-30	Ahtna. Inc does not support the increase in recreation use (commercial special recreation permits, development of facilities) and feels that it should be monitored for impacts to subsistence uses and natural resources.	Alternative C of the Draft RMP/EIS considers no additional facilities, with emphasis on managing for primitive and semi-primitive recreation experiences. Impacts to subsistence from recreational activities and proposals are considered in Chapter 4: Environmental Consequences.. BLM will continue to monitor recreation uses (particularly trail systems) for impacts to natural resources and subsistence, as described on pages 55 and 56 and as required by ANILCA, Section 810.
0164-32	Page 55 - In all alternatives dealing with recreation activities, any management activities should attempt to minimize conflict with subsistence uses, possibly through segregation of activities through spatial or temporal means.	ANILCA, Section 810, requires BLM to "evaluate the effect of any use, occupancy, or disposition on subsistence uses and needs…" This is done for all recreation-related proposals in the Draft RMP/EIS in the ANILCA Section 810 Analysis (page 645). An ANILCA 810 analysis is also done on every implementation-level project that BLM undertakes. This assures that consideration is given to minimizing impacts to subsistence resources and uses.
0164-33	Ahtna Inc. demands that the BLM develop Required Operating Procedures and Stipulations for recreational activities to meet the objective :" Maintain and protect fish and wildlife habitat on public lands, and provide for the habitat needs to fish and wildlife resources necessary to maintain or enhance such populations."	ROP-Soils-b-3 (page 611, Draft RMP/EIS) provides operating procedures for the use of Off Highway Vehicles associated with permitted activities. OHV management strategy identified in Alternatives C and D of the Draft RMP/EIS sets the stage for proactive management of casual use OHV associated with recreation, hunting, and fishing. It does this by limiting OHV use, in most areas, to existing or designated trails.
0169-2	In general, we have to support Alternative B, Development. This alternative provides the best opportunities for recreation, trail development and improvements.	Thanks for the comment. Alternative B emphasizes recreation development to mitigate impacts from increasing visitor use.
0188-2	Diversity of recreational users is provided by existing National Parks & Preserves. These lands need to be open to a wide variety of multi-user to insure diversity.	From a regional standpoint, you are correct. However, BLM is tasked with managing for a diversity of recreational opportunities. BLM, within this planning area, manages some of the most accessible public lands in the State of Alaska. The public has emphatically told us that they want (and need) the opportunity to easily access primitive, non-motorized opportunities as well as motorized opportunities.
0308-1	Through our work on the FishWatch water quality and human use monitoring in the Copper River drainage, we have seen several examples of increased recreational use in the region. One volunteer regularly counts 20 or more RVs at the Gulkana River pull-out along the Richardson Highway for most of the month of June. I realize this is not a BLM facility, but it is an indicator of rising visitation and use levels	See our response to comment 0312-1.

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	in the region and the need for facilities and management practices that will protect the integrity of our fish and wildlife habitat.	
0312-1	There is significant need for a new and innovative supply of recreation opportunities and conservation system units to help meet the demands of the current and future population of Alaska and to strengthen the expanding tourism economy. The national demand for outdoor recreation and open spaces in Alaska is constantly rising due to the growing resident population and increasing number of tourism visitors to the state.	The Draft RMP/EIS recognizes the increasing demand for outdoor recreation in this planning area (pages 172, 173). BLM's response to this demand is outlined in the range of alternatives in the Draft RMP/EIS, but includes consideration of increased and improved recreational facilities as well as designation of Special Recreation Management Areas, where management emphasis would be on continuing to provide a diversity of quality recreation experiences.
0312-75	The commercially guided helicopter skiing activities that take place on BLM lands within the planning area were not sufficiently addressed in the Draft RMP/EIS. The Draft RMP/EIS should lay the groundwork for determining what level of commercial recreation use might be appropriate in the planning area. The RMP/EIS is the planning document that is to determine if the activity should be deemed suitable on BLM administered lands, and if determined to be suitable, where and under what conditions. OHVs are handled in a similar manner in the RMP, and it is unclear why the RMP did not specifically address the commercially guided helicopter skiing activity. Please clarify for the Proposed RMP/Final EIS.	The Draft RMP/EIS does lay the groundwork for determining what level of commercial recreation use might be appropriate for specific areas. It does this by identifying management objectives based on Recreation Opportunity Spectrum classes. The Draft RMP/EIS also identifies, in Alternatives C and D, specific areas where commercial recreation use limits (including heli-skiing) would be established. Developing use limits for heli-skiing (or other commercial recreation activities) for a given area includes characterizing the area's user, knowing their tolerances for certain activities, and setting limits based on those tolerances; along with consideration of resource impacts, economic impacts, and safety concerns. To make those decisions at this level of planning would be arbitrary and capricious.
0312-76	We share concerns with local residents and users that there are no quiet areas set aside in the BLM administered lands for quiet winter recreation. Please include this in the preferred alternative in the Proposed RMP/Final EIS to offer a full spectrum of alternatives to the public.	The Proposed RMP/Final EIS includes consideration of the Delta Mountain sub-unit in the Proposed RMP (Alternative D), which would manage these areas for a non-motorized winter experience.
0317-2	Also, non-motorized recreation deserves a	This is considered in Alternative D. Alternative C considers 281,000 acres of non-

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	fairer shake in the management plan. Please increase the amount of land set aside for bi-pedal locomotion to 1 percent.	motorized area.
0329-42	More inventory and monitoring of recreation use is critical, but nobody is doing it. Why aren't you doing more? Particular needs include: total use numbers; use trends; delineation of user groups, by area and season; quantification of resource damage.	We agree that monitoring is critical, and BLM is committed to continue, as described on pages 55 and 56 of the Draft RMP/EIS. Recreation monitoring is difficult in this planning area because so many activities are dispersed. Budget constraints also sometimes limit monitoring activities.
0329-46	The Draft RMP/EIS fails to consider impacts of proposed actions on wildland recreation and tourism. For example, a big mine would diminish sport-fishing opportunities. Oil and gas development, with its security requirements, would privatize and lock up what are now open public lands.	We disagree. Impacts to recreation (including wildland recreation and tourism) are presented on pages 379-397. Cumulative impacts are described on page 537.
0329-49	The visitor centers on Denali highway are a bad idea. You shouldn't fancy this road up at all. Maintenance for safety should be a priority, but this is not a normal road that would be improved by being "improved." First, existing use is already at capacity, and additional use would be unsustainable. Second, part of the value of this road is its sketchiness. Nobody depends on this road being maintained to get anywhere. But it is worth driving as a way to see a vastness not normally encountered, and perhaps a glimpse into the difficulty of overland travel. "Improving" the area would actually decrease access to this type of recreational experience. Adding facilities to problem areas is a double-edged sword that is not appreciated in the Draft EIS. (p.455) As we note above, actively not encouraging increased use is a useful management tool that should be used.	Thanks for the comment. Alternative C would not implement any new recreational facilities along the Denali Highway. Objectives described for the Denali Highway under Alternative D (under long-term management) would be to maintain existing recreation experiences. This shows BLM's intent to try to manage the Denali Highway "as is". However, BLM also recognizes that as visitor use levels increase, some facilities are necessary to minimize impacts and to continue to provide a quality experience along the road. This drives the need for the facility develop/improvement listed under Alternative D (page 62, Draft RMP/EIS).
0329-50	Please put in place some upper use limits. There is a limit to recreational carrying capacity	The need for upper use limits is recognized for several specific recreation areas in the Preferred Alternative (Alternative D). See Delta WSR Corridor Area, Denali Highway

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	that needs to be appreciated sooner rather than later.	Area (for commercial uses), Tiekel Area (for heli-skiing), and Delta Range Area descriptions, pages60-64, Draft RMP/EIS.
0337-1	Planning for 20 to 50 years down the road is needed for the trail expansions, trail head parking, and trail maintenance in sensitive areas. If anything, these trails and trail heads should be expanded to allow for future increases in populations. It seems that a snap shot in time was used, and deemed nothing would change in usage or population.	The Draft RMP/EIS certainly considers increasing user trends, not just a "snap shot in time". See pages 172, 173. The alternatives consider a range of recreation facility develop, from very limited (Alternative C) to increased facility development to handle increased visitor impacts.
0339-2	This is some of the highest wilderness quality lands in the United States visible from some of the most treasured scenic roadways in Alaska. Alaska receives more and more tourists each year and our focus needs to shift to ecological tourism generating a benefit for the land, the people who live here and the tourist who seek wilderness.	Thanks for the comment. BLM, as clearly stated in the goals for recreation (page 55, Draft RMP/EIS) is committed to managing for a diversity of recreation experiences.
0340-2	Please consider closing more area in the management planning area in eastern Alaska to …mineral leasing …[M]ineral leasing and the mining which can often follow are incompatible w/ the recreational, wildlife, archaeological, scenic, and subsistence value in much of the planning area. Please consider some more exclusions for some of the most popular recreational areas such as the Denali highway corridor, Tangle Lakes area, and Delta River valley. The recreational and scenic wilderness value of this land is much greater and will benefit more people for a much longer time than any minerals which could be extracted from them, so I ask that you manage the area accordingly.	The Draft RMP/EIS does consider maintenance of withdrawals that would keep these areas closed to mineral entry or mineral leasing (Alternative C descriptions, pages 58-60). Alternative D recommends a withdrawal for 16,000 acres in the scenic portion of the Delta River Wild and Scenic River corridor that is currently not closed to locatable mineral entry.
0342-5	The Denali Highway is a valuable recreational resource both for its own sake and as a scenic travel link between Denali and Wrangell-St. Elias National parks. Although the recreational	Thanks for your comment. It is possible, in the Record of Decision that goes with the Proposed RMP/Final EIS, for elements from different alternatives to be combined in the final decision. The developments listed under Alternative B may not be consistent with trying to manage the Denali Highway to maintain existing recreation opportunities.

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	opportunities are identified and planned for, the plan does not highlight the role of the highway in connecting two of Alaska's great scenic destinations. The quality of experience along the highway could help determine the type and amount of visitation on the travel corridor, and the interest of independent and package tour travelers to plan trips that link the two national parks. The types of recreational facility development described in alternative B seem appropriate to support the "scenic corridor" vision. However, the scenic resource protection provisions of Alternative C or D would also seem important if the vision is to be accomplished.	Maintaining existing conditions along the Denali Highway is a common theme in public comment.
0342-6	The NPS supports the development of a multi-agency visitor center or visitor contact station in the vicinity of the Parks Highway-Denali Highway junction, which is identified as one of two such visitor facilities in the Recreation section of alternative B. If the BLM chooses the strategy identified in alternative D, in which facilities would be developed only if lands in the area are maintained in long-term federal ownership, we recommend that alternative D (BLM preferred alternative) include this visitor contact station in the list of visitor facilities to be developed (see page 62).	Thanks for your comment. See response to comment 0342-5.
0342-7	The National Park Service is interested in cooperating with BLM and other public landowners on regional planning for recreation, to insure that recreational opportunities on the various public lands are clearly identified and that visitors to the region have sufficient information to guide them to the places most compatible with their recreational interests.	Good. Because of the proximity, GFO staff work closely with Wrangell/St. Elias National Park and Preserve staff. This planning process has opened lines of communication between BLM and Denali National Park and Preserve planning staff. BLM would like to keep these lines of communication open during implementation-level planning.
0343-1	I think [Tangle Lakes, Thompson Pass, Alaska Range] should all remain open to the public for	These areas will remain open to the public for outdoor recreation under all alternatives considered in the Draft RMP/EIS. There would be some limit on motorized vehicles

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	outdoor recreation with some limit on motorized vehicles.	imposed under Alternatives C and D.
0354-8	RECREATION. We oppose ALTERNATIVE D. Management to minimize resource impacts and user conflicts is impossible without a major education effort on land ownership, allowable trail usage and private property rights and laws. Money for enforcement of said laws and regulations is required. ORV use results in "unquantified resource impacts", which must be rectified.	Thanks for the comment.
0369-1	I am concerned that your plan appears to favor resource extract over … consideration of recreational and tourism opportunities on these public wild lands.	We believe that the Preferred Alternative (Alternative D) represents a balance and considers recreational and tourism opportunities while allowing for some level of resource development. In addition, Alternative C considers a management scenario which would retain withdrawals and apply area-wide restrictions to the point where very little resource development would occur.
0371-1	Careful planning should be made on what area to open up mineral and other leasing. A lot of the area on the north side of the Denali hwy region is used for recreational purposes.	Much of the area north of the Denali Highway has been conveyed to the State of Alaska and would no longer be covered by this RMP. However, for BLM-managed lands, the Draft RMP/EIS considers a range of alternatives, including maintaining withdrawals along the Denali Highway so that no locatable mineral entry or mineral leasing would occur. The other alternatives would open most of the area for mineral entry and leasing.
SPECIAL RECREATION PERMITS		
0164-24	All land status must be settled before commercial use can be permitted.	We disagree. ANILCA (Section 906(k)) provides guidance for permitting on selected lands. This guidance is described on page 104 of the Draft RMP/EIS. It requires consultation and, in some case, concurrence.
0173-4	Recreational uses other than recreational mining should be focused in areas that do not have significant mineral potential. Trying to develop a plan that mixes both together and meets the best interest of each group is similar to mixing residential housing in the middle of commercial businesses. Neither group is happy and conflicts will inevitably arise.	As you have noted, BLM is a multiple use agency. For safety purposes, recreational use would not be permitted in areas being actively mined. However, BLM will not consider limiting recreational use simply on the basis of mineral potential.
0175-6	We are concerned about the statements regarding limitations to be applied to Special Recreation Permits within the Tiekel SRMA and Bering RNA (stated in summary tables on	The same changes as noted in response to comment 0175-7 will be made to the tables in Appendix B in the Proposed RMP/Final EIS, for consistency and clarity.

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	pages 586 and 603). We recommend noting that decisions on this issue will be developed through an implementation level planning process. In general, the state supports implementation of the least restrictive means to mitigate impacts and achieve management goals, such as education, increased enforcement of existing regulations, voluntary guidelines, commercial use permit stipulations (e.g. seasonal or temporal requirements), and other management tools.	
0175-7	The State concurs with the statement regarding Commercial Use included on page 66 in Table 4, Recreation Summary. We recommend that this statement be carried forward to the summary tables in Appendix I in order to further clarify BLM's intent.	This change will be made in the Proposed RMP/Final EIS for clarification (Appendix A).
0175-54	Page 580, Denali Highway SRMA Please edit Alternatives C and D, Denali Highway SRMA, Special Recreation Permits (SRP) to include "based on management objectives and anticipated encounters as determined through an activity planning process."	Please see response to comment 0175-7.
RECREATION OPPORTUNITY SPECTRUM		
0044-15	Recreation, wherever not already developed (p. 177) should remain primitive and non-motorized. I support the Clearwater Creek non-motorized area and would like to see it enforced. The map on page 177 should show continuous green swath of non-motorized habitat.	Alternatives C and D of the Draft RMP/EIS would manage the Denali Highway to maintain existing recreation experiences, including primitive where they exist. The Clearwater Creek non-motorized area has been dropped from consideration because this area was conveyed to the State in 2004.
0049-2	Another point that we'd like to see some clarification on is in the lands that are marked as primitive. What we'd like to know is that in a primitive experience, that doesn't mean that you can't use a motorized vehicle to get there.	This has been clearly defined in the Proposed RMP/Final EIS (page 201) to state that motorized trails do not occur in these areas. Some seasonal motorized use occurs (snowmachines) but at a very low density.
0188-3	None of this area should be classified as	Why? As stated (Draft RMP/EIS, page 174) the areas are characterized by an

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	"primitive". The term is misleading.	unmodified natural environment of fairly large size. Concentration of users is very low and evidence of other users is minimal. Sights and sounds of the road system are nonexistent and the area is remote. Human built structures are few and far between or are inconspicuous.
0360-1	I urge you to consider creating an inventory for all land in your jurisdiction that is currently roadless, and keeping such lands in their natural state.	As part of the planning process, BLM conducted a Recreation Opportunity Spectrum class inventory (pages 174, 175 Draft RMP/EIS). Because sights and sounds of any road system are non-existent in a primitive class, this inventory serves to show roadless areas.
AREAS OF CONCENTRATED RECREATION OPPORTUNITIES (SRMA)		
0006-12	The Denali Highway SRMA would create a unique opportunity; this designation would benefit not just the resource, and quiet recreationists on foot or on skis, but both resident and non-resident sightseers traveling in one of the few places in the state where lands above timberline can be enjoyed from an automobile at a leisurely pace--due in large part to the fact that the highway is unpaved.	We agree. Please see our response to comment 0312-71.
0037-1	I am advocating for the 6 non-motorized recreation areas, areas to get away from snowmachine noise, and protection from mining.	Alternative C considers 281,000 acres managed for non-motorized use, and maintenance of withdrawals that would prohibit mining on approximately 50% of BLM-managed lands.
0045-2	Regarding snowmachine use, over 99 percent of the planning area is open to snowmachine use. This in my opinion is too great. In the earlier phases of this planning effort, 6 areas were considered for quiet recreation (non-motorized) and unfortunately, only two made it to the preferred alternatives. At the least, please support the two Delta Range non-motorized areas.	Alternative C considers four different sub-units, totaling 281,000 acres, that would be managed as non-motorized, at least seasonally. Other areas were analyzed but not considered in detail for reasons explained in the Draft RMP/EIS (Stuart Creek non-motorized and Clearwater Mountains non-motorized, see page 31).
0060-16	We strongly urge BLM to develop a comprehensive trails plan for each of the SRMAs, and for other unencumbered BLM lands. Each plan should provide for a balance of motorized and non-motorized trails, and should also specify locations for development	We agree. See page 33 of the Draft RMP/EIS, under Implementation-level Planning and note that specific travel management areas described on pages 35-50 coincide with areas considered for SRMA designations (Delta and Gulkana Rivers, Delta Range, Tiekel, and Denali Highway). In other words, OHV and trail management will be a part of implementation-level plans for SRMAs.

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	of trailheads and specific maintenance plans for trails. These plans should include designated non-motorized trails for the Denali, Gulkana, and Tiekel SRMAs. Trail plans should include: a list of designated trails and allowed uses; weight or technical restrictions for use of OHVs on designated trails; minimum snow cover depth requirements for winter travel; a specific enforcement plan for each trail or each area.	
0060-21	As described in our initial comments [July 1 2004] we support the designation of SRMAs in the Delta National Wild & Scenic River Corridor, the Gulkana National Wild River, the Delta Range and the Tiekel Area. We would like to reiterate all statements and suggestions made in those comments. We further support the addition, as proposed in Alternative C, of a much larger portion of the Tiekel Area (848,000 acres as opposed to 120,000 acres) and 559,000 acres of the viewshed from the Denali Highway. The Tiekel area and the Denali Highway viewshed are important recreational areas for Alaskans and for visitors and tourists who are seeking a primitive landscape. As such it is both ecologically and economically important to protect and maintain the primitive, semi-primitive, and roaded-natural recreation experiences available in these areas	Thanks for the comment. The SRMA designations you mention are proposed in Alternative C and effects of implementing such a proposal are considered in the Draft RMP/EIS.
0060-22	In keeping with the objective of managing for wild and scenic values, we support the proposed and existing closures to development of minerals, oil and gas, roads, public use cabins, airstrips, and military activity. Closure of SRMAs to locatable mineral entry is crucial, in order to protect recreation and viewshed values.	Your first sentence is considered for the Delta and Gulkana Wild and Scenic River corridors under Alternatives C and D of the Draft RMP/EIS. Your second sentence (closure of SRMAs to locatable mineral entry) is considered under Alternative C.
0068-2	We've been restricted off of the Gulkana River	The regulations you refer to were implemented by Alaska Department of Fish and Game

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	on fishing over the years, it just goes from one to the other. Now, you can't catch kings until you get all the way down to the West Fork.	and will not be affected by this RMP.
0084-6	I support the BLM's nomination to designate the Denali Highway as a National Back Country Byway. The pristine scenery, wildlife viewing, and natural recreation opportunities available along this road are highly treasured values in need of protective management to ensure their future vitality.	Please see our response to comment 0312-71.
0097-3	In regard to winter quiet recreation, we support Alternative C since it proposes four areas amounting to 281,000 acres to be Closed to snowmachines[.]	You are correct. This is proposed under Alternative C and the effects of the proposal are analyzed. Thanks for the comment.
0104-1	The BLM must designate the Denali Highway as a National Back Country Byway. The pristine scenery, wildlife viewing, and natural recreation opportunities available along this road are incomparable and any profit that the corporations would pay to the state of Alaska would be worth far less than the loss of tourism dollars that would come if it was destroyed or damaged.	Consideration for designation as an SRMA is included in Alternatives C and D. Consideration as a Backcountry Byway is in Alternative B. Please see our response to comment 0312-71.
0164-23	Ahtna Inc. does not support the Denali Highway being designated as BackCountry Byway, as outlined in Alternative B because it is a primary hunting and migration route. Increased use that would come from such a designation would adversely affect our subsistence lifestyles.	Please see our response to comment 0312-71.
0164-25	Ahtna opposes the designation of Special Recreation Management Areas on selected lands because it would open lands up for impacts associated with increased recreation. It would also create possible trespass issues once lands were conveyed.	Designation of SRMAs on selected lands is only considered in Alternative C. The other alternatives analyze SRMA designation on unencumbered BLM lands or no designations. Effects of recreation and SRMA designations are described for natural and cultural resources on pages 398-499 of the Draft RMP/EIS.
0164-26	The recreational use in designated Special Recreation Management Areas needs to be	We agree. SRMA designation does not necessarily promote an area. Sometimes the management emphasis may be to maintain existing recreation experiences, in which

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	monitored to be sure that it is not adversely impacting subsistence resources in those areas.	case promoting use would be counter to the objectives. In other cases recreation facilities may be necessary to mitigate the impact of increasing recreational use. Under Alternatives C and D, management proposals would set the stage for more proactive management of Off Highway Vehicles.
0164-28	We support the designation of the Gulkana Wild and Scenic River Corridor as a Special Recreation Management Area to protect the river and surrounding lands to keep them in pristine and natural state.	Thanks for the comment: This is considered in Alternatives C and D.
0173-20	Delta Range Area: Locatable Minerals claims in the Canwell and Augustana sub-units should be allowed with no access restrictions. Snowmobile access can be necessary to make an exploration project cost effective. Snowmobile access should not be restricted as a form of access to the area.	Under Alternative D (the Preferred Alternative), the withdrawal against locatable mineral entry in the inner corridor of the pipeline/utility corridor would remain in place and the outer corridor would be open for locatable mineral entry. Most of the Canwell and Augustana sub-units lie within the outer corridor, so would be open to locatable mineral entry. Snowmachine access would be permitted for exploration. Access for development would be permitted through a site-specific Plan of Operations. There are currently no federal claims in these areas.
0173-21	Delta Range Area: Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures"	Alternative D considers road construction avoidance areas based on specific resource concerns or in order to maintain recreational opportunities. Your suggestion is considered and analyzed in Alternative B.
0173-22	Denali Highway Area: The BLM should not pursue the designation of this State-owned highway as a Backcountry Byway. This highway is one of the few major highways in the State. Upgrades and new construction are necessary to maintain the viability of the road and it should not be restricted by such designations.	Please see our response to comment 0312-71.
0173-23	Denali Highway Area: The Denali Highway is an important area to the economy of the State of Alaska. The majority of the Denali Highway area is State selected. It is totally inappropriate to include State and Native lands in the designation of the SRMA. These selected lands will in all likelihood become State or Native lands in the future. Therefore, no	Only Alternative C would consider designation of selected lands along the Denali Highway under an SRMA. Alternative D would consider SRMA designation if lands along the Denali are retained in federal management. Only Alternative C considers maintenance of existing withdrawals along the Denali that would exclude mineral entry or mineral leasing. Alternative D would allow these uses, with application of Required Operating Procedures to reduce impacts to the viewshed, should development occur. SRMA designation recognizes recreation as a dominant use of an area…it does not preclude other uses.

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	restrictions should be imposed on these lands.	
0173-24	Denali Highway Area: Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures"	Alternative D allows road construction for resource development in this SRMA, utilizing guidelines for maintenance of VRM Class II and III viewsheds (page 44, Draft RMP/EIS). Only Alternative C prohibits road construction. Your suggestion is considered in Alternative B.
0173-28	Tiekel Area: Locatable Minerals in the Tiekel area should remain open and PLO 5150 should be revoked to open portions of the pipeline/utility corridor (inner corridor) except within a 1/2 mile wide corridor centered on the TAPS.	Closing the area to mineral entry is only considered in Alternative C. Revoking PLO 5150 is considered in Alternative B.
0173-29	Tiekel Area - PLO 5150 should be revoked and Leasable minerals (Coal) should be opened for coal leasing and deemed suitable for development by all mining methods.	Revocation of PLO 5150 is considered in Alternative B. As explained on page 123 of the Draft RMP/EIS, all BLM-administered lands within the planning area subject to leasing under 43 CFR 3400.2 are open to coal exploration and study. The coal screening process (as identified by 43 CFR 3420.1-4) has not been conducted in this planning area. Interest in exploration or leasing of Federal coal would be handled on a case-by-case basis. This approach was chosen in this planning process because of the low potential for coal as well as the lack of interest in coal development in the area in the last 30 years.
0173-30	Tiekel Area - Lands and Realty should grant FLPMA and R&PP leases. FLPMA 302 permits and Rights of Way should be granted.	Only Alternative C would exclude these uses, in areas managed for a primitive recreation experience. Alternative D would consider these uses, consistent with recreation management objectives. Alternatives A and B would not designate an SRMA for this area.
0173-31	Tiekel Area - It is totally inappropriate to include State and Native selected lands in the designation of this SRMA. These selected lands will in all likelihood become State or native lands in the future. Therefore, no restrictions should be imposed on these lands.	Only Alternative C considers designation of selected lands within the Tiekel area as an SRMA. Management of the area with an emphasis on recreation is not inconsistent with State of Alaska (DNR) management direction for the area as prescribed in the Copper Basin Area Plan.
0173-32	Tiekel Area - Alternative D is too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures".	Thanks for the comment. Your suggestion is considered and analyzed in Alternative B.

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0187-2	I am also concerned and interested in seeing BLM take actions to conserve unique landscapes and resources identified in the plan as deserving of potential Special Rec[reation] Mgt. Areas. To this end, I strongly support the SRMA's identified in Alternative C, especially for the Tiekel area	Thanks for the comment.
0308-2	Implementation of the Denali Highway SRMA as outlined under Alternative C with the interim management provisions for state selected lands articulated under Alternative D.	This is exactly what is described under Alternative D for the Denali Highway. Under that alternative, lands retained in federal ownership along the Denali Highway would be managed as an SRMA, with objectives as described under Alternative C.
0312-62	We support the Alternative D proposals to establish Special Recreation Management Areas (SRMAs) for the Delta and Gulkana National Wild and Scenic River (WSR) corridors. These designations will direct BLM management to maintain the existing primitive and semi-primitive recreation opportunities available along the rivers.	Thanks for the comment. This is also considered under Alternative C.
0312-63	We recommend the BLM designate the Delta and Gulkana WSR corridor SRMAs as "limited" to designated trails for OHV use, with an emphasis on designated points for river crossings and sensitive areas. This standard will allow enforcement to be initiated immediately on the unencumbered lands within and adjacent to the river corridors and provide protection until implementation level planning is completed. We are concerned that this [existing as described in the draft RMP] network of trails and associated resource degradation will continue to expand and their impacts compound unless immediate action is taken to manage the use of these trails.	This change has been made. The Proposed RMP/EIS designates specific trails within the Delta and Gulkana Wild and Scenic River corridors (see pp. 51, 53 of the Proposed RMP/ Final EIS).
0312-64	We support the creation of the Delta Range SRMA. We appreciate and strongly support the Alternative D proposal to prohibit motorized use within the Augustana and Canwell sub-	Creation of a Delta Range SRMA is considered and analyzed in Alternatives C and D, along with management of the Augustana and Canwell subunits as non-motorized (year-round in C, seasonally in D). Under Alternative D, allowances would be made for snowmachine access to subsistence hunting. The Proposed RMP/Final EIS includes the

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	units. Opportunities to enjoy quiet, peaceful experiences free of motorized sounds are cherished by local users, and therefore we also support the option to prohibit commercial helicopter activities within areas managed for primitive recreation experiences.	McCallum Creek drainage as part of the Delta Mountain sub-unit (page 73, Proposed RMP/Final EIS). There is no alternative in the Draft RMP/EIS or the Proposed RMP/Final EIS that analyzes prohibition of heli-skiing in all areas to be managed for a primitive recreation experience.
0312-65	We urge BLM to persuade the State to acknowledge the primitive recreation values of the area [Tiekel SRMA] and to reach a formal agreement that if the selected lands are conveyed, the State will also strive to maintain a diversity of recreation opportunities on these public lands according to the model format presented in this draft plan.	The State already seems to recognize this, as stated in their Copper Basin Area plan for the Thompson Pass area: "The management unit should be retained in state ownership and managed for multiple use with emphasis on expanding recreation opportunities. Certain recreation activities (particularly winter recreation and OHV use) also need, or soon will need, more active management for public safety and for avoiding conflict between users."
0312-66	We also support the Alternative D proposal to designate 120,000 acres of unencumbered BLM lands as the Tiekel SRMA. Emphasis should be placed on allocating designated trails and areas for the pursuit of both summer and winter non-motorized sports. We request that consistent interim protection measures are applied to the 728,000 acres of adjacent State and Native-selected lands. In the event that these selected lands are not ultimately conveyed, the existing high quality resource condition of the lands would still remain and at that time they should be considered for inclusion within the Tiekel SRMA as proposed in Alternative C.	Thanks for your comment. Alternative C considers "consistent protection measures" on all 728,000 acres of adjacent State- and Native-selected lands. Alternative D would manage this larger area of selected lands consistent with the SRMA only if they are retained in long-term Federal ownership.
0312-67	We support the adoption of the alternative C proposal to create the 559,000 acre Denali Highway SRMA and urge BLM to take immediate management actions to mitigate the growing impacts of motorized vehicle use within the viewshed.	Thanks for your comment. Alternatives C and D both analyze proposals that would limit OHV use, in most areas to existing or designated trails. One criteria for trail designation in the Denali SRMA proposal under Alternative D, would be to locate and maintain trails to minimize impacts to the viewshed. Specific trail designation would occur under implementation level planning (see Implementation-level Considerations, pages. 38 and 44, Draft RMP/EIS).
0312-68	We also support the proposal to maintain the current ANCSA d(1) withdrawals against leasable mineral entry and the	These are both proposals that are analyzed in Alternative C of the Draft RMP/EIS.

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	recommendation to withdraw the area [Denali Highway SRMA] from locatable mineral entry. Prohibiting these two invasive, surface disturbing activities is absolutely necessary for preserving the scenic integrity of the landscapes along the corridor.	
0312-69	We encourage BLM to work with the State to ensure that measures more stringent that the State's "Generally Allowed Uses" are applied to any lands conveyed along the Denali Highway.	The State has showed willingness to adopt BLM's designated trail management in lands conveyed to the State in Tangle Lakes Archeological District. BLM will continue to work with the State on these issues.
0312-70	We support the Alternative D proposal to provide interim management [along the Denali Highway] for roaded natural, semi-primitive non-motorized, and semi-primitive motorized recreation experiences, to mitigate impacts to the viewshed, and to provide education and interpretation opportunities.	Thanks for the comment. Alternative D is BLM's Preferred Alternative.
0312-71	We also request that BLM give additional consideration to the Alternative B proposal to designate the Denali Highway Backcountry Byway as a means to maintain the current unpaved experience of the Denali Highway in a safe manner while also enhancing the BLM's authority to proactively manage recreation uses and impacts.	The BLM is committed to maintaining the existing recreation opportunities along the Denali Highway, as described under Alternative D (the Preferred Alternative), page 61 of the Draft RMP/EIS. If designation of the Denali Highway as a Backcountry Byway is consistent with these objectives, it will be considered for incorporation into the Record of Decision for the Proposed RMP/Final EIS. Ultimately, the decision to pave the Denali Highway (or not) is the State of Alaska's.
0312-77	The Denali Highway should be kept "as it is." It diversifies the Alaska tourism product by providing a moderately paced alternative to the high speed Glenn, Richardson and Parks Highways. It also has fewer limitations for camping and recreation than are found along the road to Wonder Lake in Denali National Park or the road to McCarthy at Wrangell St. Elias NP. It provides a type of linear "park system" for pleasure drivers, tourists, hikers, cyclists, and Alaskans desiring a quiet, unhurried, scenic route along the Alaskan Range. The Denali Highway should be	Thanks for the comment. Alternatives C and D (long-term management in D) would manage the Denali to "maintain existing recreational opportunities (primitive, semi-primitive non-motorized, semi-primitive motorized, and roaded natural). See pages 59 and 61 in the Draft RMP/EIS. The BLM agrees with your vision but also recognizes that some facility development may be necessary to minimize impacts from increasing visitor use along the road and to maintain a quality roaded natural experience.

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	managed to preserve this unique recreational driving experience for future generations to enjoy.	
0321-10	We support alternative C's designation of 848,00 acres of the Tiekel Area and also designating 559,000 acres of the viewshed from the Denali Highway as SRMAs to maintain the primitive, semi-primitive, and roaded-natural recreation experiences available in the areas.	These proposals are considered and analyzed under Alternative C of the Draft RMP/EIS. Thanks for your comment.
0331-7	We strongly support SRMA provisions of alternative C over alternative D because: Alternative C has a Denali Highway SRMA; alternative D does not. For many of us, the Denali Highway is a favorite area for hiking, subsistence hunting, picking berries, and canoeing. All these activities are enhanced by the scenic beauty along the highway. A Denali Highway SRMA would protect this special viewshed.	Thanks for the comment. Please note, for Alternative D, that under Long-Term Management (page 61, Draft RMP/EIS), SRMA designation would be considered, with objectives as described for the Denali Highway in alternative C.
0331-8	[We strongly support SRMA provisions of alternative C over alternative D because] the Tiekel SRMA would be seven times larger under alternative C than under alternative D. This provides for more protection for wildlife and a fairer allocation of land for quiet sports.	Thanks for the comment. Total area managed for non-motorized recreation in Alternative C amounts to 281,000 acres.
0331-9	[We strongly support SRMA provisions of alternative C over alternative D because] alternative C prohibits commercial heli-skiing north of the Tiekel River and Stuart Creek; alternative D does not. In other communities around Alaska, the failure of land managers to set fair limits on helicopter-supported recreation when it is in its early stages has created bitterness. Residents are dismayed when the noise of helicopters invades their homes; non-motorized recreationists cannot find the solitude they seek. People do have	Thanks for the comment. As you point out, the Draft RMP/EIS considers a range of alternatives for the management of helicopter supported recreational activities…from only site-specific limitations under Alternatives A and B to identification of areas where this activity would be prohibited, based on specific management objectives under Alternatives C and D.

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	residences in the Tiekel and Tonsina areas, and those areas are also desirable for cross-country skiing and snow-shoeing.	
0331-10	[We strongly support SRMA provisions of alternative C over alternative D because] new road construction would generally be prohibited under alternative C; it would be permitted under alternative D "if no feasible alternative exists". New road construction would conflict with the purposes of providing primitive and semi-primitive experiences.	Thanks for the comment. As you point out, the Draft RMP/EIS considers a range of alternatives for areas identified as avoidance areas or to be excluded from new road construction. Impacts to recreation (both negative and positive) are discussed in the Draft RMP/EIS on pages 381, 384, 389, and 393.
0331-11	Alternative C prohibits motorized watercraft on Tangle Lakes; Alternative D merely recommends horsepower limitations. There are a number of reasons for a total prohibition of motorized watercraft: 1) Tangle Lakes are part of a Wild and Scenic River System; motorcraft are incompatible with that concept. Visiting canoeists would be disappointed to encounter motorcraft and their noise. The noise carries well beyond the lakes, so hikers in the corridor are also disturbed; 2) These are not large lakes; motors are unnecessary, even for transporting game meat; 3) Motorcraft pollute the air and water. Two-cycle engines in particular release considerable unburned fuel. This is unhealthy for waterfowl, fish, and the people who eat them; 4) Motorcraft are more likely to disturb wildlife; 5) There have already been some instances of jet-ski and hovercraft use on Tangle Lakes. These are exceptionally noisy, and are generally disliked by all but the users. A prohibition should be in place now, before the use of these machines becomes established.	Under Alternative C, BLM would recommend to the State that motorized watercraft be prohibited on Tangle Lakes. This is a management action that would be consistent with objectives for the area described under Alternatives C and D and would be considered in implementation level planning, subject to coordination with the State and Native Corporations and public involvement. Thanks for your comment.
0341-13	We support ...designating 559,000 acres of the view shed from the Denali Highway as an SRMA to maintain the primitive, semi-primitive,	This is a proposal that is analyzed in Alternative C of the Draft RMP/EIS.

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	and roaded-natural recreation experiences available in the area. p.66	
0355-19	[I]n the Delta WSR Corridor Area and the Gulkana WSR Corridor Area, the reference to being the same as Alternative C in inconsistent and not correct.	If your comment is referring to pages 43 (for the Delta) and 45 (for the Gulkana) the statements "the same as under Alternative C" refer to the area which would be designated, not specific management actions or objectives.
0355-21	[U]nder Delta Range Area, the reference to being the same as Alternative C is inconsistent and not correct.	The text "the same as Alternative C" refers to the number of acres that would be designated as an SRMA, not specific management actions or objectives.
0355-22	There is no justification for limiting snow machine use of the area. [Delta Range Area]	Justification will be added in the Proposed RMP/Final EIS (pp. 70, 73). It is based on a) managing to maintain an existing primitive non-motorized experience; b) managing to maintain a diversity of recreation experiences when snowmachine use is starting to increase in a traditionally non-motorized area; and b) public comment supporting such management.
0355-23	Also, the comment on road construction references only land within the corridor; it should not be limited to just the corridor.	The "comment" referred to is language from ANILCA, section 1110, which allows for construction of roads in Conservation System Units (this reference is to the Delta River Wild and Scenic River corridor). Road construction is permitted if it can be demonstrated that the road is compatible with the values for which the river was designated, and if there is no feasible alternative route. This section of ANILCA does not apply on BLM lands outside of Conservation System Units.
0355-24	There is no justification for requiring only non-motorized hiking trails [in the Delta Range Area]. Alaska contains 165 million acres for such activity; no such restrictions are needed here.	There is no alternative that considers only non-motorized trails for the whole proposed Delta Range SRMA. Justification for managing the Canwell and Augustana sub-units as non-motorized is addressed in our response to your comment 0355-22.
0355-25	Similarly, under the Denali Highway Area, the reference to being the same as Alternative C is inconsistent and not correct.	The wording "same as Alternative C" is used in the comparison table on page 579 of the Draft RMP/EIS. The reference here is correct: OHV management along the Denali on lands retained long term by the federal government would be the same as described under Alternative C: limited to designated trails.

3. NATURAL AND CULTURAL RESOURCES

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GENERAL NATURAL AND CULTURAL RESOURCES		
0044-24	The military reserve is already large enough so that other BLM land need not be usurped for military uses. "Dog fighting" by military aircraft should be curtailed over the Denali highway corridor as it affects wildlife and tourists. Sonic booms have started avalanches. The Chaff and fuel purging by both military and non-military aircraft may be causing fires or degrading water and vegetation quality. Perhaps BLM can work with ADFG to investigate the role of these activities with miscarriages, deformities and other wildlife problems.	The tables on pages 573-604 of the Draft RMP/EIS include a row that shows BLM's management intent regarding permitting of military activities on BLM-managed lands, for specific areas. This varies by alternative. BLM cannot regulate air space but has provided (and will continue to provide) input into military Environmental Impact Statements regarding military aircraft. This has resulted in realignment of Military Operations Areas (MOAs) in order to avoid low-level overflights in areas such as the Wild and Scenic River Corridors.
0164-38	BLM must develop a proactive, ecosystem approach to natural resources throughout the planning area.	BLM feels that management proposed under the Preferred Alternative (Alternative D) represents a more proactive approach than under current management, particularly in addressing issues such as OHV management and management of 17(b) easements.
0354-23	BLM's management policies must reflect more oversight on: 1) Damage to the environment, critical habitats and historic sites, that include plans for reparation.	Chapter III of the Draft RMP/EIS describes resource impacts that occur from different activities on BLM-managed lands. Chapter II considers a range of alternative actions that prescribe management to address these impacts. Chapter IV considers the environmental consequences of implementing these different management alternatives. In other words, where we know there is damage occurring to the environment, it drives the need for management actions.
0367-1	I am very concerned about your agency's plans to open 3.9 million acres of Alaskan land to oil and gas leasing and 6 million acres to hard rock mining. It would appear obvious that these actions would permanently change the land and wildlife habitat in those areas, as well as damaging traditional activities and recreation.	3.8 of the 3.9 million acres "opened" to mineral leasing under Alternative D (the Preferred Alternative) are currently State- or Native-selected. Because of a segregation against mineral leasing on selected lands, no leasing could occur on these lands until a) they are conveyed to the State or Native corporation, at which time the decision to allow mineral leasing is up to them, or b) the selections are relinquished and the land is retained in long-term Federal ownership. Just because an area is "opened" to leasing or locatable mineral entry, it doesn't mean that development will occur. There are many other factors that come into play, including mineral potential, access, and marketability. See Draft RMP/EIS, page 122, under Management Areas.
0376-6	The second one I had written down is BLM	Title 11 of ANILCA and specifically section 1107 deal with rights-of-way across public

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	needs to enforce ANILCA, Section .1107 for protection of the lands and water resource.	lands that access or cross Conservation System Units. BLM will comply with 1107 in consideration of right-of-way applications or right-of-way management within CSUs (the Delta and Gulkana National Wild and Scenic Rivers are the only BLM-managed CSUs in this planning area).
SOILS		
0175-50	Page 399, Impacts to Soils from Recreation. It is incorrect to state that recreational activities generally do not cause long-term impacts to soil. Extensive studies have shown that heavily used hiking trails, particularly in tundra ecosystems, can cause long-term impacts to soil, including erosion and compaction. Please revise this section to properly acknowledge recreational impacts.	Although such impacts from foot traffic can occur, we are not aware of a hiking trail on BLM-managed lands in the planning area where such impacts exist. From our perspective (based on experience maintaining trails), any impacts attributed to hiking in this area pale in comparison to OHV impacts.
WATER QUALITY		
0010-6	We'd like to see good water quality, mainly because it's good for the environment. It's good for the ecosystem as well. And for you that are not aware, that some communities actually depend on--maybe an individual depends on some of the river water for drinking. Gulkana Village, where I come from gets its water from the Gulkana River. Not directly, we drill a well near the river because we cannot get water anywhere else that is good for drinking. So we're very concerned about the quality of the water. The pollution of water is a concern.	Thanks for the comment. The Draft RMP/EIS recognizes impacts to water quality from different activities that are currently occurring in the area (pages 187, 188, 410, 461, and 462). Within the range of alternatives considered, different management actions are considered for protection of water quality, including restrictions on OHV use, maintenance of minerals withdrawals in specific areas, and application of Required Operating Procedures for permitted activities (see Chapter II as well as ROPs, pages 617, 618, Draft RMP/EIS).
0010-10	What as a group, Ahtna people want to bring up is that we have a concern about what's being dumped into our rivers and what happens when these off-road vehicles cross streams and so forth, what effect it has. You are right there's very little said about the effect of these access crossing streams and the effect on quality of the water down below.	Effects of OHVs on water quality is discussed on page 410 of the Draft RMP/EIS. Impacts to fish and fish habitat from sedimentation and OHV use is discussed on pages 461 and 462, Draft RMP/EIS.
0044-23	All major lakes and streams should be tested	Pages 73 and 74 describe BLM's intent, common to all alternatives for water quality

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	yearly for baseline of data.	monitoring. Testing yearly for all major lakes and streams in the area would be cost prohibitive.
0055-3	There is no mention of water quality for humans or fish habitat when discussing locatable minerals. The Pogo gold mine near Delta is described (p. 373, first paragraph) without mention of the cyanide leaching of ore and subsequent containment of tailings that will occur. Water contamination is recognized as a risk associated with containment of toxic substances in settling ponds at mining operations (p. 449, first paragraph).	Impacts to water quality from mining are discussed on pages 411 and 418. Impacts to fish and fish habitat are discussed on pages 461 (sedimentation), 463, and 471. Required Operating Procedures for mining operations to protect water quality are listed on pages 616 and 617, Draft RMP/EIS.
0164-27	Ahtna Inc. support the active management of water quality in the Copper River watershed as it directly impacts traditional use of the water. Water quality monitoring should be conducted to gather baseline inventory data to compare changes in water quality.	We agree. See our response to comment 0376-1.
0175-38	Page 187, Water Quality. Please acknowledge those existing non-point source water pollution prevention measures that are in place.	This is acknowledged in the Proposed RMP/Final EIS (page 215).
0329-74	What does it mean that mining now happens under state water quality standards? (p.187)	Mining operations must comply with State Department of Environmental Conservation's Water Quality Standards (18 AAC 70). These include standards for color, fecal coliform, dissolved gas, dissolved inorganic substances, petroleum hydrocarbons, pH, radioactivity, sediment, temperature, toxic and other organic and inorganic substances, and turbidity. Different standards are set based on the water use (recreation, domestic water supply, aquaculture, fisheries, etc.).
0355-37	Under the discussion of Water Quality impacts from Mineral Exploration and Development (page 411), the wording suggests that mining would cause "degradation of water quality through sedimentation and other pollutants". This statement is repeated at various places (including page 418) later in the document. This statement is not correct. Mining is required to meet very stringent discharge requirements and impacts, if any, would be very minor. All mines are required to recycle	It is implied in the water quality section that there is potential (key word) for degradation of water quality from mineral exploration and development. It is true that current mining laws are stringent and most operators are diligent in meeting stipulations. However, some operators are not as diligent and as a result there is degradation of water quality from stream bank erosion and higher sediment loads, as well as hydrocarbon pollution. This is not just an operator problem but a State of Alaska and BLM compliance problem.

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	their process water and to treat any water before it is discharged in accordance with the applicable State Water Quality Standards.	
0357-3	When those types of vehicles [OHVs and ATVs] impact water resources, greater enforcement and monitoring are needed to ensure the environment they entered is not permanently damaged. And when possible, through planning and monitoring, better and more management plans should be developed to protect all water resources and water bodies with regards to fish.	BLM is committed to monitoring OHV impacts through ongoing trail inventory and assessment (see page 33, Draft RMP/EIS, under Inventory and Monitoring). One of the primary concerns in considering designation of trails (as described in alternatives C and D) is minimizing stream and river crossings and the potential for water quality degradation.
0376-1	Chitina supports the active management of water quality of the Copper River watershed as it directly impacts traditional use of the water. Water quality monitoring should be conducted to gather baseline inventory data to compare changes in water quality.	We agree. See page 74 (Draft RMP/EIS), 5th bullet statement under Inventory and Monitoring: "Develop water quality data base in priority fish habitats and important recreation use areas to establish baseline for monitoring."
0390-3	And we are concerned about the water, if it was coming from Klutina, you know, the Pipeline runs right underneath the Klutina River, and so if there's any disaster, you know, it'll ruin the water and it will ruin all the fish that comes up the Copper River.	Thanks for the comment. The Trans-Alaska pipeline is located on a right-of-way which is co-managed by BLM (Joint Pipeline Office) and Alyeska. An Environmental Impact Statement considering the effects of renewing the pipeline right-of-way was completed in 2002. This RMP will not effect administration or maintenance of the Trans Alaska Pipeline. In response to your comment, the Proposed RMP/Final EIS includes a discussion on pipeline administration (page 326) and a discussion in Cumulative Effects, water quality regarding potential impacts of a spill (page 584).
AIR QUALITY		
0044-22	Periodic air quality data throughout the planning region should be in place (p.189) as the plan moves forward.	BLM will continue to comply with State requirements for air quality on activities that potentially adversely effect air quality, such as prescribed burning (see page 190, Draft RMP/EIS).
VEGETATION (INCLUDING SENSITIVE STATUS SPECIES)		
0044-2	Several locations (i.e. page 367) mention "vegetation treatments." What are they? Would they degrade species diversity, pollute air or water or bioaccumulate like poisons and carcinogens? Subsistence activities on land through this planning region - regardless of "ownership" - would create liabilities for those	Vegetation treatments include timber harvest, wildland fire, prescribed fire, fuels reduction projects (pages 300-310, Draft RMP/EIS). A general discussion of vegetation treatments proposed by alternative can be found in Chapter 2, pages 113-121. Effects from vegetation treatments are described in Chapter 4.

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	using such "vegetation treatments". Perhaps the best vegetation treatment is a person with a shovel.	
0044-5	Regarding noxious weeds and invasive plants (p.196, 544 and other locations), my informal twenty five year surveys show that trails and staging areas used by horse, OHVs, boots, tires, etc. add new species to those trails or areas. In this draft planning area, trails already show evidence of this. One example is a horse and boot trails to Clearwater Creek.	Thanks for the information. This is a developing program for BLM in Alaska and the Glennallen Field Office is currently working on inventory and education (page 544, Draft RMP/EIS). Required Operating Procedures ROP-Soils-a-10, ROP-Soils-a-12, ROP-Veg-a-2, and ROP-Veg-a-3 (pages 610-620) are designed to prevent spread of invasive species and noxious weeds.
FISH AND WILDLIFE(INCLUDING SENSITIVE STATUS SPECIES)		
0019-1	But I also think that we should also look at Alternative C, which is the conservation alternative. Because it's not only important to preserve hunting opportunities, it's also important to protect the habitats of the animals that you would like to hunt, and Alternative C does that. So I would ask people to have a close look at some of the things that are being protected under Alternative C that are not being protected under the other alternatives, or at least not as well. … 200 years ago there were probably billions of passenger pigeons in North America. They're gone. Every last one of them. None of us has ever seen a passenger pigeon. I would hate to see that happen to any of the critters that we appreciate around here today, and it's important for us to protect them and their habitat for that reason.	Thanks for the comment. Alternative C does consider more area-wide protective measures than does Alternative D. Effects of both approaches on wildlife habitat are discussed in Chapter 4 of the Draft RMP/EIS.
0026-1	[W]e oppose the sale of lands in Slana because a lot of that area is migratory bird habitat, too, and we think that areas should be preserved.	The Draft RMP/EIS acknowledges the loss of habitat that would occur with the disposal of all remaining BLM lands in the Slana area (Draft RMP/EIS, page 457, under FLPMA Disposal"). The Draft also considers alternatives that would not dispose of lands in the Slana area in Alternatives A and C.
0084-5	I am concerned that there are zero protective designations for wildlife and fisheries habitat within the Preferred Alternative.	We disagree. The Bering Glacier RNA identifies several measures for protection of fish and wildlife and unique ecological values. In addition, a cooperative habitat management plan would be developed with ADF&G for the Delta Bison Calving Area; area-wide protective measures would be applied for the West Fork Gulkana Area (see

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		page 84, Draft RMP/EIS); designated trails would be located with protection of wildlife habitat in mind; and the ROPs and Stips described on pages 612 - 615 would protect wildlife habitat.
0312-106	BLM also states in its summary of alternatives for Leasable Minerals, Oil & Gas that all "essential habitat" for threatened and endangered species will be avoided. See EIS at page 132 (Table 10). BLM should provide a definition of "essential habitat."	This definition will be provided in the glossary of the Proposed RMP/Final EIS.
0321-7	In addition, We are also concerned about the impacts on the Copper River watershed and fish and game populations if mining exploration is allowed in the Tangle Lakes area.	The preferred alternative would maintain current withdrawals within the Delta Wild and Scenic River corridor that prohibit mineral entry. Tangle Lakes is within this corridor. It also recommends withdrawal of 16,000 acres within the corridor that is currently open to locatable mineral entry. Other alternatives consider opening the area (Alternative B). Effects of these different management options are discussed in Chapter 4.
0329-57	A Copper River Watershed ACEC would benefit wildlife by preserving a keystone species: salmon. Salmon protection can serve as a reasonable surrogate for other, more complex resource values. For example, conserving riparian areas for salmon also tends to preserve migration corridors.	A Copper River Watershed ACEC was considered during the planning process, but was eliminated from detailed analysis for the following reasons: a) BLM currently manages only approximately 15% of the lands within the watershed, 50% of which are selected lands that will probably not be retained under Federal management; b) strong protective measures will be continued along the Gulkana River, BLM's largest piece of unencumbered land in the watershed, through the proposed SRMA designation and continued management as a Wild and Scenic River; c) protective measures will be put into place through measures identified for the West Fork Area and the Tiekel SRMA (see Tables on pages 598 and 583); and d) application of ROPs and Stips for permitted activities apply strong protective measures for anadromous streams. This information will be added to the Proposed RMP/Final EIS under Alternatives Analyzed but not Considered in Detail (page 39).
0331-14	Wildlife habitats best protected under alternative C, through many of features: ACECs, the Bering Glacier RNA, and SRMAs. In addition, alternative C places more protections on moose winter range and fish habitat than does alternative D.	Alternative C does consider more area-wide protective measures than does Alternative D. Effects of both approaches on wildlife habitat are discussed in Chapter 4 of the Draft RMP/EIS.
0341-7	[T]he BLM's Preferred Alternative proposes: 79% increase in the amount of lands open to oil and gas leasing (5,637,000 acres = 79% of entire planning area) 78% increase in the amounts of lands open to locatable mineral entry (6,032,000 acres = 85% of entire	Of the acres "opened" to mineral leasing under Alternative D (the Preferred Alternative), most are currently State or Native selected. Because of a segregation against mineral leasing on selected lands, no leasing could occur on these lands until a) they are conveyed to the State or Native corporation, at which time the decision to allow mineral leasing is up to them, or b) the selections are relinquished and the land is retained in long-term federal ownership. Just because an area is "opened" to leasing or locatable

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	planning area) These are unnecessary and unreasonable increases, especially in light of the fact that the impact to fisheries habitat has not been fairly evaluated. In addition, impacts to caribou and moose habitat have from this proposed increase has not been evaluated.	mineral entry, it doesn't mean that development will occur (see page 122, Draft RMP/EIS). Effects of potential mineral development to fish and wildlife by alternative are discussed on pages 434-476 of the Draft RMP/EIS. This includes a discussion of impacts to caribou and moose habitat. For example, discussion of impacts to the Nelchina caribou calving grounds is discussed on page 445.
WILDLIFE (INCLUDING SENSITIVE STATUS SPECIES)		
0020-7	Thirty five percent of the Trumpeter swan population and the Nelchina herd is in our area [Mentasta] and yet, your book doesn't even show trumpeter swans being up there. We have a beautiful trumpeter swan breeding area. That includes all the way up to the headwaters of the Copper River.	The Draft RMP/EIS acknowledges the importance of the Copper Basin for trumpeter swan habitat (page 241, Draft RMP/EIS) and shows trumpeter swan breeding and nesting habitats on Map 38, which includes the Mentasta area.
0020-26	Migratory bird habitats are in danger now, mainly from human encroachment. These trails are not being maintained. There's four migratory bird treaties that affect four counties [countries], much less our migratory bird treaty that hasn't been considered in all this, in the plan.	The Draft RMP/EIS discusses migratory birds in general (page 229) and the specific status of Sensitive Status migratory bird species on pages 231 - 243. Alternatives C and D consider travel management proposals that would limit OHVs to designated or existing trails, thus minimizing cross-country travel and the proliferation of unmanaged trails. Effects of this strategy on wildlife habitat (including migratory birds) is described on page 454 for Alternative D (the Preferred Alternative). Specific Required Operating Procedures were developed to protect migratory bird habitat and species, based on requirements in the Migratory Bird Conservation Act (See ROP-F&W-a-14, p. 613). The Migratory Bird Treaty Act of 1918 was also used in development of Required Operating Procedures and stipulations and will be cited in the Proposed RMP/Final EIS.
0020-28	The trumpeter swans and Dall sheep breeding areas in the Mentasta area were not included but they need to be protected. Those two particular, the Dall sheep and the trumpeter swan is supposed to have additional protections under the law and they don't.	Dall sheep habitat and trumpeter swan breeding and nesting habitats are specifically shown on Maps 32 and 38 of the Draft RMP/EIS, including the Mentasta area. The Preferred Alternative (Alternative D) considers area-wide protective measures for the trumpeter swan in the West Fork Gulkana area (page 84). In addition, the Preferred Alternative identifies the following Required Operating Procedures and stipulations for all trumpeter swan and Dall sheep habitat: ROP-F&W-a-12, ROP-F&W-a-13, ROP-F&W-b-1, and ROP-F&W-b-6 (pp.613 -615). Dall sheep and their habitat are not afforded any special State or Federal protections under law, as this species is biologically sound and stable throughout their range. However, where Dall sheep lambing habitat is located within BLM-managed lands, ROPs and Stipulations (Appendix C) apply to protect their habitat.
0044-6	The Caribou Habitat map (p215) does not show the complete extent of the summer foraging area. My knowledge is only about the	All wildlife habitat maps within the Draft RMP/EIS were compiled from ADF&G wildlife atlases (and other valid sources where available); the caribou's habitat map that you refer to on page 215 is based on information gathered from ADF&G's Susitna Area Plan,

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	Clearwater foraging areas thus far not taken into account.	circa 1983. Because caribou are known to be highly nomadic in their search for food throughout the year, the best land managers can do is describe in general terms the past distribution and movements of caribou herds. Caribou tend only to be tied to one specific location on an annual basis, that being their traditional calving grounds. The caribou habitat map on page 215 indicates these general patterns as described in 1983 by ADF&G; site specific variations outside of the indicated ranges are to be expected.
0044-7	Moose habitat map (p.221) does not show the complete extent of summer foraging on and around Clearwater Mountains.	Our habitat maps are based on wildlife habitat atlases obtained from the state (ADF&G). BLM will make changes based on updated information, if it is made available to BLM.
0044-8	Raptors discussion (p.225) does not mention the Northern Hawk Owl. Of special interest to tourist and naturalists would be the Denali Highway corridor where Hawk Owls hunt in the evening between Alpine and Clearwater Creeks.	As explained on page 204 of the Draft RMP/EIS, "Only those species of wildlife considered important as a subsistence resource, economically important to Southcentral Alaska, or otherwise a high profile species, will be covered in this chapter." Chapter 3 also covers Sensitive Status species. Page 225 of the Draft RMP/EIS does include the northern hawk owl in its list of common raptors found on BLM-managed lands.
0044-9	Ptarmigan were not included in the draft plan although BLM lands contains critical rearing and mating habitat.	A discussion of ptarmigan distribution has been included in Chapter 3 of the Proposed RMP/Final EIS (page 257).
0044-10	Swan breeding and nesting habitat (p.239) changes with hydrological conditions but not all of the more "permanent" appropriate habitats were shown. Unnamed lakes, including those near Susitna Lodge and Swampbuggy Lake, should be added.	The map on page 239 is based on the latest information available gathered during the U.S. Fish and Wildlife Service's 2000 trumpeter swan census. Individual trumpeter swan nesting site locations may vary slightly on an annual basis, but not widely. Therefore, the information provided within the Draft RMP/EIS is as accurate as is possible for this scale of planning within the area surrounding the Susitna Lodge. The Draft RMP/EIS (page 241, fourth paragraph) specifically acknowledges the presence and abundance of trumpeter swans and their breeding habitat in the Susitna River valley.
0044-12	The Gray-cheeked Thrush (p.234) use the riparian area of Windy Creek near Susitna Lodge. I have seen them spending much of the summer in the western section of the Clearwater Mountains.	Thank you for the information. The Draft RMP/EIS concurs that the Gray-cheeked Thrush would be found in this habitat type ("prefer habitat types where shrub is the main component or where open woodlands and dwarf forests are present").
0044-13	There is no discussion of Alaska's Frogs. There are a few in the wetlands and around the unnamed lake near Susitna Lodge.	There is a short discussion (page 229, Draft RMP/EIS) on the western toad and the wood frog.
0044-14	As stated in the draft, not only is data on wildlife species, ecosystems and habitat inventory and details of subsistence uses incomplete, but also the fragmented "ownership" and use/development of the land	Thanks for the comment and suggestion.

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	tends to put species at risk. Thus planners … should plan and act cautiously to protect areas until more information and better technology is available to develop carefully.	
0044-30	Memoranda of Agreement (BLM, ADFG, ADNR, and the military bases) should be established (p. 542) to create sanctuaries for calving areas for Bison, Caribou, and Moose. The Susitna Area Plan seems a reasonable place to include them. All critical habitat for wildlife (and tourists) should be protected from sonic boom and fuel purging.	BLM will work closely with ADF&G on implementation-level planning for these areas. The Preferred Alternative (Alternative D) would implement a cooperative Habitat Management Plan with ADF&G for the Delta bison calving range. It also identifies protective measures for the Nelchina Caribou Calving Area (pages 77 and 84, Draft RMP/EIS), as well as ROPs and Stipulations specific to caribou calving (ROP-F&W-b-2).
0055-5	Breeding success of Townsend's warbler (p. 242, first paragraph) has been positively correlated to size (a proxy for age) of white spruce in southcentral Alaska by S.M. Matsuoka. 1996. Habitat selection and reproductive ecology among Townsend's warblers (Dendroica townsendi) in southcentral Alaska. M.S. Thesis, University of Alaska-Fairbanks. 66 p.	Thanks for the information. We will include it in our Chapter 3 discussion of Townsend's warbler in the Proposed RMP/Final EIS (page 268).
0055-6	Discussions of how oil and gas leasing influence wildlife populations contain what appear to be definitive statements of fact without scientific documentation. The last sentences of the third paragraphs on pages 444 and 446 contain statements that need to cite the scientific authority or be qualified as speculation.	This is a professional opinion based upon the application of the ROPs and Stipulations and based on the amount of development anticipated (two gas fields) relative to the total area of undisturbed habitat in the area.
0163-1	If the feds keep it [pipeline/utility corridor], we would hope that they would consider a shorter hunting period, giving the caribou a much needed respite from hunters, snowmachiners and the stress that occurs from being hunted in the difficult winter months. It seems to us that during these months caribou need all the support possible to successfully winter. As it is now hunters and snow machines put great	BLM coordinates closely with State ADF&G in management of the Nelchina caribou herd. Hunting seasons and harvest of cow caribou is adjusted to allow for variations in population. Latest information indicates that the Nelchina herd population is in the vicinity of 40,000 animals, thus a cow harvest is being allowed this season. Alternatives considered within the Draft RMP/EIS would not change the administrative process by which federal subsistence hunting regulations are reviewed and analyzed for implementation during harvest season..

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	stress on them in the winter months. Please consider change in policy.	
0163-2	ATV trails must have restrictions to protect wildlife. We support Special Recreation Management Areas to help curtail the spiderwork of ATV trails.	In response to resource concerns discussed in Chapter 3 of the Draft RMP/EIS (including impacts to wildlife and wildlife habitat), alternatives C and D consider designating most BLM-managed lands as limited to OHVs, with specific limitations to be determined in implementation-level planning. In most cases under Alternatives C and D, on unencumbered BLM lands, trails will be designated, and on State-selected lands, OHVs will be limited to existing trails. Effects of taking such actions on wildlife and wildlife habitat are described in Chapter 4.
0164-35	Page 10 - In the first paragraph under Issue 3 there is no mention of the significance of the Nelchina Caribou Herd to subsistence users in the Copper River Basin. There is no mention of the Mentasta Herd. Ahtna Inc. requests that this information be included in the Final Plan.	Chapter 1 of the Proposed RMP/Final EIS includes a sentence on the importance of the Nelchina herd for subsistence (page 11). A paragraph has been added to Chapter 3 of the Proposed RMP/Final EIS discussing the location and status of the Mentasta caribou herd (page 235).
0164-37	Page 204 - In the introductory discussion of wildlife objectives there is no overall description of or data relating to the subsistence use of large and small lands mammals in the planning area (on pp. 248-250) there is a description of Subsistence Fisheries). Data relating to the harvest of moose and caribou is available from the Federal Subsistence permits issued in the area. Ahtna Inc. requests that this information be compiled and included in the Final Plan.	This information will be included in the Proposed RMP/Final EIS, in a Chapter 3 discussion of subsistence (pp. 373 – 375).
0164-42	The Mentasta Caribou Herd needs to be protected from associated impacts of development.	The Mentasta Caribou Herd spends little to no time on BLM-managed lands. As mentioned above, the Proposed RMP/Final EIS will include a discussion in Chapter 3 about the Mentasta herd (page 235).
0164-43	More complete trumpeter swan breeding and nesting habitat information must be included fort he Mentasta areas (to include Swan Lake, Mineral Lakes area, Indian Pass Lake etc.)	Please see response to comment 0020-28. The specific lakes you mention in your comment are not on lands managed by BLM; these are within Native-owned lands.
0164-44	BLM and HAARP must work together to minimize impacts of operations on migrating birds.	See response to comment 0020-26. HAARP is a federally-owned and managed facility (Department of Defense) and all HAARP actions and on-site developments are subject to NEPA review and federal laws for the protection of migratory birds. Decisions made in this RMP will not affect HAARP.
0173-42	We support the responsible management of wildlife and its habitat in compliance with State	The Draft RMP/EIS states, under Planning Criteria (page 16), "Wildlife habitat management will be consistent with ADF&G objectives." The BLM has coordinated

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	and federal regulations. All habitat management must be done in consultation with State of Alaska Department of Natural Resources and comply with State law regarding such resources.	closely with Alaska DNR during this planning process (page 564) and will continue to do so on implementation of this plan. This may be done on the local level, as well as local involvement of ADF&G.
0175-13	Pages 36 and 42, West Fork Area, Implementation-level Considerations. We request the Bureau cooperate with the State to evaluate off-highway vehicle use, habitat conditions, and trumpeter swan population information before developing any restrictions in this area to protect trumpeter swans.	As indicated, this would be done in implementation-level planning for Off Highway Vehicle use. BLM does consider area-wide stipulations for permitted activities in the Preferred Alternative (Alternative D), pages 78 and 84. These stipulations are consistent with measures identified in the State DNR Copper Basin Area Plan for protection of trumpeter swans and trumpeter swan habitat.
0175-14	In addition, we request the Bureau cooperate with the State to evaluate snowmachine use, habitat conditions, and moose population information before developing any restrictions designed to minimize impact on moose. Few moose use the West Fork Area during winter months, unless snow levels are very deep, causing moose to move down into the flats area from the surrounding hills. Additionally, there is very little snowmachine use in this area. What little snowmachine use does occur is primarily from trappers managing their traplines. If the Bureau compounds this unnecessary restriction on snowmachine trails by designating trapping trails as public use trails, this can affect trappers by drawing recreational users to their traplines.	As stated, this would be an implementation level consideration, and consultation would occur with State ADF&G at that time.
0175-16	Pages 36 and 42, Delta Bison Calving Area, Implementation-level Considerations. Delta bison herd use is concentrated on the Delta River floodplain, where off-highway vehicles currently do not travel (until the large channels freeze). The herd currently utilizes the floodplain between the pipeline and the Richardson Highway. The herd encounters	As stated, this would be an implementation level consideration, and consultation would occur with State ADF&G at that time. In response to your comment, Glennallen Field Office staff have observed OHVs being ferried across the Delta River in jetboats from east to west and off-loaded for cross-country travel within the western portion of the Delta River floodplain and beyond. OHV use is occurring in this area.

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	traffic on either side, with no documented negative impacts. We object to proposals that would unnecessarily restrict off-highway vehicles to designated trails unless additional justification is provided.	
0175-17	Pages 37 and 43, Nelchina Caribou Calving Area, Implementation-level Considerations. We concur that it is not desirable to disturb caribou during the calving season. However, additional information and coordination with state agencies is needed to adequately protect calving grounds while allowing use of the Nelchina public use area. The State currently owns the largest and most heavily used portion of the calving grounds (south of this designated area) where off-highway vehicle access is prominent. The designated area within the BLM plan lies beyond common off-highway vehicle travel. We request the Bureau cooperate with the State to evaluate off-highway vehicle use, habitat conditions, and caribou population information during implementation-level planning before developing any restrictions in this area to protect caribou.	As described on page 33 of the Draft RMP/EIS Implementation-level Planning, "these planning processes would include public, State, and Native coordination."
0175-33	Page 118, Vegetation Management, Moose. The map referenced in this section (on Page 221) is inaccurate and does not distinguish differences in winter habitat. Instead of focusing on all winter critical range (based on the map), we request the Bureau work with the ADF&G to develop site-specific priorities for areas utilized during severe winters. We also request that the Bureau place emphasis on burning (both wild and controlled) to produce favorable habitat conditions for moose.	The wildlife habitat maps were compiled from information obtained from ADF&G wildlife atlases (Susitna Basin Area Plan, 1983; Copper Basin Area Plan, 1985; Alaska Habitat Management Guide - Southcentral Region, 1985; and Yakataga Area Plan, 1993). More specific winter range information which differentiated between types of winter ranges across the area was not available at the time of RMP development. Given the vast number of acres in the planning area that would benefit from wildland and prescribed fire, BLM identified general habitat improvement priorities based on information available to us. We will continue to work with local ADF&G biologists to develop site-specific habitat improvement priorities, as was accomplished with regard to the Alphabet Hills prescribed burn and with other subsequent vegetation management efforts on the district.
0175-39	Page 206, Caribou, 4th paragraph. More current population data are available for the Nelchina Caribou Herd than presented. The	Thank you. The updated information will be included in references to the Nelchina herd in the Proposed RMP/Final EIS. This is a constantly changing figure based on semi-annual surveys and estimates.

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	Nelchina Herd currently exceeds 35,000 animals, which resulted in liberalization of both the state and federal subsistence hunting regulations. The most recent population estimate for the Nelchina Caribou herd is 36,677 (2004). The final ADF&G Management Report for the Nelchina Caribou Herd in Units 13 and 14B from July 1, 2002 to June 30, 2004 contains the most recent population estimates (in press, 2005).	
0329-37	Thank you for considering that helicopters harm wildlife. Please apply this to management of Bering Glacier, and oil & gas.	It is considered in different management alternatives for the Bering Glacier. Both Alternatives C and D consider prohibiting helicopter-supported commercial recreation activities in this area.
0329-55	Our primary interest here is in conserving a functioning ecosystem. If conserved, this system will produce a sustainable supply of critters for subsistence eating, sport hunting, recreational viewing, photography, and a million other uses we have yet to realize.	We agree.
0329-56	Please consider the value of non-consumptive uses of wildlife, too.	We do. This is often a consideration when we manage an area with an emphasis for recreation (such as an SRMA). Wildlife viewing is a recognized component of most recreation experiences in the area (page 172, Draft EIS/RMP, 1st paragraph).
0329-58	We disagree with the goal: "In collaboration with the State of Alaska's identified wildlife population management objectives, the Glennallen District emphasizes wildlife habitat enhancement due to continuous and increasing pressure for natural resource agencies to produce more animals for consumptive uses by an ever-increasing local human population."(BLM 2003, MSA Wildlife, p.1) Large-scale wildlife habitat manipulation is sketchy in a vast wildland such as this, with complex interactions between species that haven't been studied, aren't understood, and are vulnerable to stresses. Wildlands aren't a farm, and a mechanistic approach is asking for trouble. (NRC 1997) Boosting populations of	The Draft RMP/EIS states goals for the wildlife program, which include "In cooperation with ADF&G, ensure optimum populations and a natural abundance and diversity of wildlife resources, including those species that are considered BLM sensitive status species" (page 72, Draft RMP/EIS). BLM's goals for management of wildlife habitat reflect an ecosystem management approach: "Maintain and restore the health, productivity, and biological diversity of forest and woodland ecosystems." (page 113, Draft RMP/EIS).

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	critters for increased consumptive use by humans is not sustainable. Manipulating wildlife populations to make hunts available for more non-residents makes them vulnerable to sudden collapse—which threatens subsistence hunting. The subsistence priority includes an implicit requirement to management for sustained yield.	
0329-59	We are concerned that while hunting pressure in increasing, habitat is decreasing. This is clearly not sustainable.	BLM is also concerned about quality of habitat (see pages 206 and 208, Draft RMP/EIS), particularly for moose and caribou habitat. BLM, in it's Preferred Alternative (Alternative D) identifies approximately 1.5 million acres as a priority for habitat improvement, mostly through wildland fire or prescribed burning. If your comment is about loss of habitat, both refugia and habitat fragmentation are addressed on page 434 of the Draft RMP/EIS and is of concern to BLM under all alternatives.
0329-60	The Draft attributes increased hunting pressure mostly to increasing population, but the population of the Copper basin is not what you'd call booming. This land could sustain the number of people living there now. Hunting pressure is extreme only when outside pressure of non-resident hunters, especially from Anchorage and Mat-Su, is added. BLM has unique responsibility to defend the priority of rural Alaskans to sustainably harvest subsistence resources. Please help guard against unsustainable non-resident hunting, by limiting access. Or, at least, don't encourage increased use.	The administrative procedure for establishing federal or state subsistence hunting regulations or the state procedure for establishing sport-hunting regulations is out of the scope of this planning process. BLM is committed to providing access to public lands. No alternative considers closing of major access routes, though area-wide motorized restrictions are considered (Alternatives C and D).
0329-61	Under alternative C, "Barring the occurrence of large scale wildfires in the Copper River Basin, resource manager could expect to see a continued decline in overall habitat quality and productivity" (p.455) Why wouldn't there be large scale wildfires? The Draft EIS/RMP seems to act like this is a static system. It isn't.	Page 298 of the Draft RMP/EIS discusses fire occurrence in the area and explains "Lack of large fire occurrence is due in part to fire suppression but also to the abundance of wetlands and other natural breaks interspersed throughout the planning area." Even in 2004, when over 6 million acres burned state-wide, the largest fire in the planning area was a prescribed burn of 40,000 acres set in the Alphabet Hills.
0329-62	The Draft EIS doesn't explain the positive effects to wildlife of designating ACECs, SRMAs, RNAs, Wilderness Areas or W&SRs.	The Draft RMP/EIS does compare the effects of implementation of ACECs, RNA, and SRMAs vs. not designating these areas on wildlife. See pages 437, 440, 450, 451, 455, and 456 of the Draft RMP/EIS.

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	The benefits are huge. Adopting alternative C, and our recommended special areas, would increase wildlife, and have the important benefit of providing refugia. There is value in having a buffer against the unexpected.	
0329-63	It is not true that "wildlife become habituated" to disturbance, resulting in no "undue adverse effects to individuals or populations." (p.446) In many cases wildlife do not habituate, but change their behavior to avoid the disturbance. ... Human disturbance can permanently harm wildlife populations. The fact that critters don't drop dead within sight of an oil derrick, does not mean there aren't any "undue" impacts. ... What is an "undue" impact? In other cases, habituation is itself a negative impact, as when bears habituate to people's garbage and get shot, or when bunnies habituate to the highway and get squished. Just saying, in effect, "they'll get used to it," is not enough. Critters, like people, can "get used to" all sorts of awful things.	Habituation or acclimation is the development of tolerance to the effects of something acquired through continued exposure, whether positive or negative. "Undue" means excessive; in this case, individuals or populations of wildlife would not be subject to excessive or adverse effects because of exposure to routine and predictable human activities. Where known or discovered during field reconnaissance, all types of development, whether recreational, mineral or oil and gas, etc., would be sited so as to avoid areas of crucial or sensitive wildlife habitat. We agree that in certain situations, the habituation of wildlife to human activity and presence at oil and gas development sites can be negative for both the wildlife and humans, such as with bears habituated to human presence, their activities and the use of human-generated garbage and other food stuffs. In this regard, the Draft RMP/EIS stipulates that permittees will handle and dispose of all human-generated wastes to prevent the attraction of wildlife (see Appendix III, Required Operating Procedures, Hazardous Materials, in the Draft RMP/EIS).
0329-64	We are concerned that nest buffers are arbitrarily determined, and won't be effective. "To be effective, buffer zones should be based on empirical evidence of wildlife responses to disturbance." (Richardson & Miller 1997, p.637) What evidence are you basing buffer distances on?	Considering that up to 131 species of birds return each spring to Alaska, it is not possible to empirically define a minimum buffer distance for the nests of each avian species that occupies breeding habitat within the boundaries of the planning area. However, we have and will continue to provide general spatial and temporal protections for migratory bird breeding habitat as spelled out by the U.S. Fish and Wildlife Service in their final Region 7 Migratory Bird Timing Matrix. In addition, three species of birds have received set individual minimum buffer distances due to their relatively low density across the landscape…these are the bald and golden eagles and the trumpeter swan. At a minimum, the Bald Eagle Protection Act (as amended in 1978) provides for a buffer zone of 330 feet around an active bald eagle nest. However, USFWS recommends a minimal buffer zone of at least 660 feet based on topography and vegetative screening from disturbance to the nest site. At most, USFWS recommends a buffer zone of 1/2 mile. 1/4 mile was chosen by BLM because this distance will adequately address all disturbance possibilities. Also, a minimum buffer distance of 1/4 mile has been applied to bodies of water occupied by nesting trumpeter swans, as originally defined by the ADF&G in both the Copper River Basin Area Plan and the Susitna Area Plan.

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0329-65	There is a lot of Trumpeter Swan breeding and staging habitat in the Yakataga state game refuge and adjacent area. This is not mapped on Map 13 (p.93), or discussed in the text of the Draft. Please consider that the Bering Glacier forelands are incredibly valuable swan habitat.	The map on page 239 of the Draft RMP/EIS (Trumpeter Swan Breeding and Nesting Habitat) shows numerous sites in the Bering Glacier foregrounds and Yakataga Game Refuge; however, it should be noted that BLM-GFO manages only a small portion of the Bering Glacier foregrounds and none of the Yakataga State Game Refuge. Those lands which provide the majority of suitable breeding habitat for trumpeter swans are managed by the State of Alaska. This area and it's value as swan habitat is discussed on page 241 of the Draft RMP/EIS. Proposed protective measures for the area for alternative D are discussed on page 85, Bering Glacier Area; page 602, Bering Glacier RNA alternative comparison table; and specific ROPs and stipulations, including ROP-F&W-a-12, ROP-F&W-a-13, and ROP-F&W-b-1.
0329-93	The Draft EIS fails to appreciate negative impacts to wildlife from forestry. The Draft EIS/RMP has absolute, and blind, faith in ROPs. It says: "The ROPs adopted under this alternative would ensure that timber harvest would provide for the conservation of valuable wildlife habitats or adequately compensate for their degradation."(p.443) What is the basis for that? Is there any evidence? The ROPs for forestry are pretty standard, yet even where have been applied, negative impacts have followed. Mitigation will not be so effective as the Draft EIS/RMP supposes. Tongass timber sales, for example, typically contain much more restrictive mitigation measures. Yet, USDA routinely admits that impacts are substantial.	The Draft RMP/EIS acknowledges the potential for negative impact from timber removal and road construction on some specific wildlife species (page 443); however, forest management practices can be consistent with wildlife habitat objectives. The "faith" in the ROPs is not blind, but based on the experience of the biologist in planning and implementation of local timber sales. The forestry program at Glennallen Field Office is small (see pages 312 - 314) with an estimated harvest of 40 acres/year or 2.0 MMBF on average. Even under alternative B, this is not timber harvest on a scale anywhere near the Tongass, which has an annual projected harvest of 182 MMBF per year. The "faith" in ROPs is based on the fact that road construction associated with timber sales is, by necessity, kept to a minimum and use of temporary winter access is often utilized.
0329-186	It is interesting that the Bering glacier forelands have "genetically distinct populations of wolf and goat," as both those critters face a barrage of threats in this area. (p.451) What is the status of those populations?	This information has been erroneously reported as fact and will not be included in the Proposed RMP/Final EIS. Thanks for catching it.
0354-2	The four (4) treaties that govern conservation, even just the Canadian treaty which provides for co-management process, or the Migratory Bird Treaty, were not considered in regulations affecting wetlands and the protection of migratory bird habitat. BLM, in it's own words (p.14), "manages fish and wildlife habitat", yet	See response to comment 0020-26 and comment 0020-10 regarding re-location of 17(b) easements.

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	the lack of management of 17 (b) easements has not prevented harm to these habitats	
0354-9	Some information is missing, including the Trumpeter Swan and Dall Sheep breeding areas in the Mentasta area (p.93, Map 13).	Please see response to comment 0020-28.
0354-10	Trails must be relocated and 17(b) easements restored to original conditions to avoid further crucial habitat damage.	The Draft RMP/EIS states that "realignment of 17(b) easements would be considered with the cooperation of the land owner on lands already conveyed." Where documented resource damage is occurring, including damage to fish habitat, BLM will, in consultation and cooperation with Ahtna, Inc., consider re-location of the 17(b) easement or maintenance of selected areas, based on the priorities listed on page 34 of the Draft RMP/EIS. These actions are discretionary and will be contingent on funding approval.
0354-26	BLM's management policies must reflect more oversight on: 4) Adherence to Migratory Bird habitat treaties with stronger enforcement.	Please see response to comment 0020-26.
0354-30	Actions for BLM-managed lands must include: 3) Active research, education and monitoring of damaged habitats.	We agree. See page 74 of the Draft RMP/EIS, under Inventory and Monitoring, Wildlife. Please keep in mind that monitoring identified on this page is contingent on funding.
0385-3	And I also think of the mention of swans and the protecting of the trumpeter swans and noting that that was not mentioned in the Chitina area as well. You know, I think that needs protection as well.	Trumpeter swan breeding and nesting habitat is shown for the whole planning area, including locations in the Chitina area (page 239, map 38, Draft RMP/EIS). Measures for protection of swans are noted in our response to comment 0020-28. BLM does not manage land in the Chitina area which provides suitable breeding/nesting habitat for trumpeter swans.
FISH (INCLUDING SENSITIVE STATUS SPECIES)		
0044-4	How is BLM coordinating with Alaska DFG to enhance fisheries, as mentioned on page 541?	Currently, BLM is cooperating with ADF&G on funding and personnel to operate a fish-counting facility on the Gulkana River, which is providing critical information for setting salmon escapement goals on the Gulkana River. BLM has also worked with ADF&G on a recent habitat assessment and inventory project, and is currently involved in cooperative steelhead population monitoring projects and lake trout monitoring.
0044-11	Sensitive Fish Section (p. 250) does not mention Grayling, although they are important to this area and sensitive to development and overfishing. The Denali Highway corridor streams and lakes contain not only Grayling, but also other species of interest. The unnamed lake by Susitna Lodge contains Pygmy White Fish. Dwarf Dolly Varden are in Seattle Creek and Canyon Creeks. No doubt	As stated in the glossary (p. 693), sensitive status species are "those wildlife, fish, or plant species designated by the BLM Alaska State Director, usually in cooperation with the State agency responsible for managing the species, as sensitive. They are 1) species under status review by U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service; 2) species whose numbers are declining so rapidly that Federal listing may be necessary; 3) species with typically small and widely dispersed populations; or 4) species inhabiting ecological refugia or other specialized or unique habitats." Arctic grayling, in Alaska, do not fit into any of these categories.

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	there are other fish species that have not been inventoried and may affect planning and development.	
0044-29	As stated on page 540, activities upstream of BLM lands can have adverse affects on fisheries and water quality. All agencies should work together to address these concerns.	We agree. BLM is committed to coordination and consultation, both in this planning process and in implementation level planning (See Draft RMP/EIS, pp. 16, 7th bullet, and pp. 562 - 564).
0055-4	The section on wildlife effects almost completely ignores fish habitat. For example, water drawdown from lakes for construction of ice roads “would alter water levels and adjacent habitats” (p. 445, second paragraph), an effect that could be highly detrimental to overwintering fish. Development of coal bed methane involves pumping large amounts of subsurface water to the surface (p. 329, last paragraph) that could contaminate surface waters and subsurface aquifers with high mineral concentrations or methane, degrading fish habitat and potentially endangering human health with respect to drinking water. BLM suggests it would permit in-field underground injection (p. 372, last bullet point) but does not clarify whether re-injection would be required as a best management practice in oil and gas development.	Effects from water withdrawal on fish and fish habitat are discussed on page 469 of the Draft RMP/EIS. Based on geology of the area, accessibility, and marketability, the Draft RMP/EIS states "it is unlikely that industry will produce commercial amounts of gas from lignite coal within Alaska for the reasonably foreseeable future." This is also stated under Resource Assumptions on page 371. Consequently, effects analyses were based on these assumptions. Re-injection is required as a Required Operating Procedure under ROP-Haz-b-3, page 625 of the Draft RMP/EIS.
0083-1	I am concerned that even the "conservation alternative" … would harm salmon by opening their spawning grounds to oil and gas drilling, mining, and other unsustainable development.	Alternative C, the "conservation alternative", prohibits mineral leasing on approximately 50% of BLM-managed lands through maintenance of existing withdrawals. However, even on lands open to oil and gas leasing, there is a No Surface Occupancy Stipulation for all lands within 200 feet of anadromous streams (pp. 130, 131, Draft RMP/EIS) as well as a Required Operating Procedure prohibiting drilling or facility location within 500 feet of anadromous streams.
0164-5	Blanket permits issues by the State of Alaska do not adequately allow Native Corporations to address individual concerns regarding anadromous streams. The BLM need to be involved in the permitting process to cross anadromous streams where it affects BLM	We are and we will continue to be involved as implementation-level planning progresses. BLM worked closely with the State (DNR) on identification and location of authorized crossings in a recent implementation level planning effort for the Gulkana River.

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	managed lands.	
0164-36	Page 72 - Under A) Goals for wildlife there is no reference to ensuring the continued subsistence benefits of such resources as there is for the Fisheries and fish resources. Ahtna Inc. requests that this goal statement be modified to include the above information.	This goal is stated on p. 149 of the Draft RMP/EIS under subsistence: "Conserve healthy populations through management and protection of habitat and subsistence harvest permitting and regulations."
0164-39	Page 248-249 - The second and third paragraphs under Subsistence Fisheries contain some inaccuracies as to the events relating to the Glennallen and Chitina Sub-districts.	We reviewed the information referred to in your comment and could find no inaccuracies.
0175-26	Page 72, Goals, Fisheries, 2nd sentence. The use of "restore" in this sentence implies that the current abundance of salmon and steelhead stocks in this area are below historic levels. No data are presented to support this implication. Please consider the following information related to this issue. Until 1999, there was no measure (besides aerial survey indices) of Chinook salmon escapement into the rivers of the area. In 1999, ADF&G initiated a mark-recapture study on Chinook salmon on the Copper River and, since that time, has met the escapement goal in most years. ADF&G has monitored sockeye salmon escapement in the Copper River with the Miles Lake sonar since the early 1980s. Since 1984, the Department met the escapement goal for sockeye salmon every year but one. Steelhead in the Copper River drainage are on the fringe of their distribution, and little is known about where stocks occur in the tributaries (except for the Gulkana and Hanagita rivers).	Thanks for the information. The word "restore" was used in reference to steelhead. The word "restore" has been removed in the Proposed RMP/Final EIS.
0175-27	Page 75, 2) Maintenance and Restoration, Fisheries, 1st bullet. No data are presented to support the implication that habitat destruction or degradation limits the current population of	This statement does not say or imply that habitat destruction or degradation limits the current population of steelhead and rainbow trout on the Gulkana. We are saying that we will continue to cooperate with ADF&G on these efforts. The Draft RMP/EIS (page 247) states "Fish populations and habitat conditions in the planning area are good for

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	steelhead and rainbow trout in the Gulkana River. The Bureau and ADF&G are currently conducting a study to estimate abundance of rainbow trout. If successful, this would be the first estimate of abundance for this system. Previously, the ADF&G estimated steelhead-spawning abundance at two of the known spawning sites on the Middle Fork Gulkana (Dickey Lake and Hungry Hollow), but it is not known if these sites represent the majority of spawning steelhead that return to the Gulkana River. Since 1991, rainbow trout and steelhead regulations limit fishers to catch and release. Anecdotal information from anglers and observations of recent expansion in the river indicate that the rainbow trout population is increasing. There is no evidence that habitat is presently a limiting factor in steelhead and rainbow trout abundance in the Gulkana River.	both anadromous and resident species."
0175-41	Page 249, Third full paragraph, 2nd sentence. This sentence suggests that demand for Copper River salmon may increase slightly during the next few years “due to a combination of an increase in urban users and rural users opting to get federal permits as opposed to state permits.” We agree that an increase in the number of urban users could result in an increase in harvest, but do not understand how or why a change in the type of permit obtained by rural users might generate an increased harvest. We request the Bureau clarify this point.	Thanks for the comment. This sentence has been changed in the Proposed RMP/Final EIS for clarification (page 280).
0175-48	Page 369, Fish, last sentence. Section 1314 of ANILCA confirms that the State of Alaska retains authority to manage fish and wildlife on public lands. Clarification of this role and a commitment to cooperate in related matters is addressed in the Master Memorandum of	This sentence has been changed in the Proposed RMP/Final EIS to incorporate your suggestion (page 406). The State/BLM MOU has been added as Appendix K in the Proposed RMP/Final EIS.

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	Understanding between the Bureau and the Alaska Department of Fish and Game. We request the final plan include a copy of the Master Memorandum of Understanding as an appendix. In addition, we suggest the Bureau revise the sentence to the following: The BLM will cooperate with the Alaska Department of Fish and Game to manage, protect, and maintain the genetic integrity of Alaska's wildstock populations of salmon. This revision more closely resembles the respective authorities of the Bureau and the Department to manage fish and wildlife habitats and populations.	
0186-2	I object to the elimination of the entire "Fisheries" section of the plan.	This comment is in reference to a draft alternative packet that was distributed, then replaced with another version. However, the Draft RMP/EIS addresses fish and fish habitat in all chapters. Management actions proposed for fisheries protection or for monitoring are shown by alternative on pages 73-86. A description of the current condition of fish and fish habitat is included on pages 244-251. Effects of different management actions, by alternative, are described on pages 461-477.
0312-17	BLM stated that, other than the Copper River salmon, there is no known subsistence dependence for salmon in the planning area. Draft RMP/EIS at 248. BLM provided an analysis of the subsistence harvest of Copper River salmon for the years 1998-2002 and stated that demand is likely to remain stable or increase slightly within the next 5-10 years. Draft RMP/EIS at 249. This fails to provide any subsistence analysis for any other species of fish or any other river system in the planning area. Please include analysis of the proposed alternatives for fisheries management and an analysis of the direct, indirect, and cumulative impacts of fisheries management decisions in the Proposed RMP/Final EIS.	Subsistence use other than salmon is minor and most non-salmon subsistence use (Dolly Varden, whitefish, burbot) is satisfied through sport fishing. However, the Proposed RMP/Final EIS includes a discussion on other subsistence fisheries use in the planning area (page 280).
0321-6	The impact of soil erosion from OHVs on water quality and salmon spawning must be	Impacts from OHV management on fish and fish habitat, by alternative, are described on pages 461, 462, 463, 464, 466, 471, 472, 474, and 475. "Mitigation" of impacts is

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	assessed and mitigated.	described through different management options considered in Alternatives A-D. Alternatives C and D consider classifying most areas as limited to OHVs, which would ultimately result in less unmanaged trail proliferation and unauthorized stream crossings.
0329-33	The Draft EIS incorrectly presumes all impacts to fish from ATVs are "localized." (p.463) This flies in the face of watershed analysis. Water runs downhill. Decreased habitat decreases the overall fish population.	We disagree that this is what the analysis concludes. On page 464 of the Draft RMP/EIS, the conclusion (for effects from alternatives A or B) is: "The unauthorized and unmanaged proliferation of trails would increase under this alternative, with a resulting increase in erosion and sediment impacts." Effects of sedimentation on fish habitat is explained on page 461, Draft RMP/EIS. The analysis clearly concludes that Alternatives A or B (relative to OHV management) would have an adverse impact on fish habitat.
0329-54	The Draft (p.73) says that all action alternatives would "support continued monitoring and assessment of riparian areas." Please follow through on this. Please systematically inventory all of the fish streams in the area. According to a rough comparison of expected miles of salmon habitat in a watershed this size and type, and the existing state catalogue of anadromous fish streams, less than half the salmon streams in the Copper River Watershed are listed in the state register. This is important not just as a measure of our ignorance, but because that habitat isn't protected under the law.	BLM is committed to monitoring and assessment of riparian areas. BLM just completed participation in a cooperative effort with State DNR assessing rivers and streams in the Upper Susitna and portions of the Copper River watershed for addition into the anadromous stream catalog.
0329-67	The Draft EIS under-appreciates the importance of and impacts to Wild Copper River Salmon. It ignores the commercial fishery, except in terms of it's impact to subsistence, personal use and sport fisheries. As stated above, this fishery has immense value to a wide variety of users, and action alternatives are critical to sustainable salmon management. Yet, the Draft EIS doesn't even disclose an impact, beyond "localized" impacts.	See response to comment 0341-1.
0329-68	We are alarmed at reports that area resident fish populations show classic signs of over harvest, despite ADF&G supposedly managing fisheries to be sustainable. (p.250) That's great ADF&G is trying to "turn these trends around,"	Population management is the State's responsibility. However, BLM's goals for fisheries habitat management are clearly stated (page 72, Draft RMP/EIS). BLM is certainly sensitive to "not encouraging increased use" in certain areas we are trying to manage for a primitive recreation experience. BLM is committed to maintaining access to public lands but will consider site-specific limitations where quality of recreation experience is

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	but are they? Please protect wild fish populations from over harvest; by limiting access, not encouraging increased use, and other means. Don't pass this responsibility off to the state.	compromised or where resource problems occur as a result. This would occur during implementation level planning, as discussed on pages 33 – 50 of the Draft RMP/EIS under Travel Management.
0329-69	What is the basis for stating that "Future demand on freshwater fish resources is anticipated to remain at current levels."? (p.250) Given that demand for everything else is increasing, and that fast-growing industrial tourism specifically targets fish, this strikes us as a very dangerous assumption.	Thanks for the comment. This is an editing error has been corrected in the Proposed RMP/Final EIS.
0329-70	The Draft EIS/RMP supposes that increased stress on salmon in the area will immediately be counter-balanced by decreased sport harvest. ... This is wishful thinking. It is entirely foreseeable that the state would neglect to manage the salmon resource sustainably, refuse to reduce sport fishing limits, and/or fail to detect a declining fishery. The consequence would be that subsistence users would be the first to feel the impact of increased use, or decreased habitat, for fish. Please consider that another, in our view much more likely consequence would be that the fishery would continue at an unsustainable rate. This could drive fish stocks extinct in the extreme, or at least have negative effects that would ripple out through the ecosystem. This would increase pressure to supplement wild stocks with hatchery fish, which further stresses the natural system and threatens wild stocks. As we note above, habitat management is just as, if not more important than fisheries harvest management to achieving a sustainable fishery.	BLM's goal for fisheries management is clearly stated and emphasizes protection of habitat (p. 72, Draft RMP/EIS). BLM believes in ADF&G's commitment to managing salmon for sustainability. They annually devote tremendous time, money and effort to monitoring through radio-telemetry, aerial surveys, videography, and other means of counting salmon (such as the fish counting tower on the Gulkana).
0329-71	What is the basis of the statement that "factors currently limiting anadromous fish populations	This sentence has been re-written in the Proposed RMP/Final EIS to say: "Currently, habitat quality is not a limiting factor in anadromous fish populations in the planning

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	are not generally habitat oriented in the planning area?" (p.247) What factors are limiting? This statement is incorrect, because fish populations come directly from quality habitat.	area." The basis for this statement is explained on page 278 of the Proposed RMP/Final EIS and is attributed to "habitat conditions in the planning area are good for both anadromous and resident species."
0329-72	The Draft EIS fails to consider or disclose impacts to the fish in the Copper River watershed, or any other watershed. Yet, this is the critical measure of impacts, because on the watershed scale is where impacts occur. Again, we strongly urge you to consider impacts to the major watersheds in the planning area. What percentage of the watersheds is at stake? How developed are they currently? These factors must be considered.	The Draft RMP/EIS considers impacts to fisheries habitat from management actions and allowable uses proposed in the range of alternatives considered. This includes impacts from anticipated levels of OHV use, mineral development, oil and gas development, recreational use, and lands and realty actions anticipated for each alternative. These impacts are described in the Draft RMP/EIS on pages 461-477 and cumulative impacts are described on pages 540 and 541. RMP decisions are broad and general and describe what activities would be allowed in what areas. This document does not propose specific locations for activities; this is done in implementation level planning. So, by necessity, the analysis of impacts is somewhat general in nature because specialists don't know exactly where (or if) development might occur. This is explained on page 361 of the Draft RMP/EIS. "Development" in the watershed (for BLM-managed lands) is described in Chapter 3, under Leasable and Locatable minerals, Land & Realty, Vegetation Management, and Recreation.
0329-73	The Draft EIS totally ignores the Gulkana hatchery, which is on BLM land. It says "fishery management activities within the planning area are currently limited to harvest of fish resources under State regulations." (p.247) That is not true. We are concerned that the Gulkana hatchery, which is at largely on public land and operates under a BLM permit, will threaten the long-term viability of Wild Copper River Salmon. Please incorporate by reference our comments on the "EA" for the Gulkana hatchery, which apparently came too late it the process to matter. Evidence is abundant and increasing that hatcheries—even low-tech, indigenous-stock hatcheries like at Gulkana—interfere with wild runs. Please take a more balanced approach, and ensure that the genetic integrity of Wild Copper River Salmon is preserved. The Fisheries MSA estimates the Gulkana hatchery produces 17.25% of the total	The Proposed RMP/Final EIS will include a discussion of the hatchery (page 273).

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	Copper River salmon return. Strangely, that information was specifically deleted in the same paragraph in the Draft EIS. Why?	
0329-75	We are concerned about Gulkana steelhead. With the growth of use, and targeted sport fishing, this fish could be extirpated from the area. Management actions that impact salmon would generally have similar impacts to this population of steelhead. For example, limiting damage to watersheds from ATVs would have positive habitat impacts for steelhead. Wild & scenic river designation would probably have benefits. Please consider these impacts in the Revised Draft EIS/RMP.	The Gulkana River is already a Wild and Scenic River and no alternative considered within the Draft RMP/EIS would change that status. Alternatives C and D would limit OHVs in the Gulkana Wild and Scenic River corridor to designated trails, to minimize river crossings and ensure that crossing occur at places where habitat impacts would be minimized. As emphatically pointed out by ADF&G in their comment 175-27, there is no evidence that habitat is presently a limiting factor in steelhead and rainbow trout abundance in the Gulkana River.
0329-109	The Draft EIS severely understates the known impact of oil spills on aquatic ecosystems, and salmon in particular. (p.470) Newer science has shown that Oil and salmon don't mix.	Which research to cite about oil toxicity to salmon is arguable. However, the bottom-line conclusion is based on a very low likelihood of large spills getting into anadromous streams. As stated (page 470, Draft RMP/EIS) this conclusion is reached based on specific Required Operating Procedures, as cited.
0329-119	We disagree that "the prevention of drilling in rivers and streams would provide fish with adequate protection." (p.469) That is an awfully low bar to set. We are further amazed that this stipulations has exceptions written into the rule. It is never reasonable to drill for oil in a salmon stream.	ROP-F&W--a-6 states the roads, well pads, and other oil and gas facilities will not be allowed within 500 feet of fish-bearing rivers and lakes. The Proposed RMP/Final EIS, in Appendix C, will include "exploratory oil and gas drilling" in this ROP and will delete ROP-F&W-a-7. This will strengthen protection of fish and fish habitat.
0330-1	After reviewing the EIS, we have concerns regarding proposed actions occurring within [Yakutat] city and borough boundaries. The chief concern is that changing water law allowing mine tailings to be placed in lakes and eliminating mixing zones creates the sense that any future mining and drilling activity in our borough has the potential to affect salmon habitat and production.	Alternative C of the Draft RMP/EIS would prohibit mineral entry or mineral leasing within this area through maintenance of an existing withdrawal. Alternative D would lift the withdrawal on the eastern 1/3 of the BLM-managed area, allowing for mineral entry or mineral leasing in the area. Because of the extreme topography, limited geological potential, and very difficult access, future mineral development in this area is considered highly unlikely. However, in the event of exploration or development, the following Required Operating Procedures would provide protection for salmon habitat: ROP-Water-a-1, ROP-F&W-a-6, and ROPs-Water-b-1 through Water-b-7 (page 616, Draft RMP/EIS).
0330-2	Our concerns are the effects on fisheries habitat associated with future extraction activities that the preferred alternative would allow. The main fishing river for Yakutat is the	Management actions proposed within the range of alternatives considered in the Draft RMP/EIS will not effect the Situk River or the other rivers you mention (East Alsek, Italio, West Fork Situk, and Old Situk). BLM has some lands on the Malaspina Glacier, all on the surface of the glacier itself. The forelands in this area are Native lands. No

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	Situk. With the warming trends, geophysical activity and present industrial uses, fish returns have become erratic as seen in a historic low harvest of Situk sockeye this season. This effects all fisheries; subsistence, sport, and commercial. As climate changes continue many rivers that presently support harvestable runs of fish will begin to decline (East Alsek, Italio, West Fork Situk, and Old Situk Rivers are present examples). Rivers that are currently glacial and sediment filled will become more productive as headwater lakes clear and primary productivity increases. This includes rivers draining from the proposed land use change. If the water quality of these areas is compromised through by-products of drilling and mining elasticity of the system will be lost.	likelihood of mineral exploration or development exists on these BLM lands.
0341-1	The BLM "Draft Plan" does not adequately address and evaluate potential impacts to salmon habitat and salmon fisheries from proposed development and land use options. …The current plan fails to adequately address land use issues affecting subsistence, commercial, and sport fisheries. As a matter of fact, the draft fails to even mention commercial fishing.	The Draft RMP/EIS includes 16 pages of description of effects on fish and fish habitat from the different alternatives (pp. 461 - 477). The effects discussion focuses on fish habitat rather than populations, because ADF&G is responsible for management and monitoring of populations, though BLM cooperates in monitoring (p. 247). Commercial fishing is mentioned in the Draft RMP/EIS (p. 249). The Proposed RMP/Final EIS will discuss commercial fishing in more detail, including the economic importance (p. 273, Proposed RMP/Final EIS).
0341-4	It remains true today that the economy and culture of the Copper River watershed relies primarily on the stability of the wild salmon runs in the Copper River ecosystem. Failure to evaluate the effects of management options on the habitat that sustains these fisheries is an omission that substantially affects the ability of the commenting public to fairly evaluate the options presented.	See responses comments 0341-1 and 0329-72.
0354-5	On (p. 369), BLM will continue to manage and protect and maintain the genetic integrity of Alaska's wildstock populations of salmon", yet	According to recent ADF&G surveys, king salmon continue to use Bone Creek for spawning and have not been "eliminated" by trail use crossing Bone Creek. The Draft RMP/EIS (page 34) allows for BLM to participate in 17(b) easement maintenance (which,

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	King Salmon have been eliminated by trail use crossing Bone Creek (Mentasta area) with no management of the 17(b) easement. ... Trespass is a problem as the right-of-way is both a contested RS 2477 and 17(b) easement used not just for access, but for unauthorized uses such as camping, hunting, fishing, etc., yet BLM does not recognize the impact of this particular 17(b) easement which also crosses a Native Allotment.	in some cases, would reduce trail braiding and subsequent trespass), based on priorities listed on page 34. Regarding enforcement, BLM has only a non-possessory interest in a reserved easement, which is the right to use the land for a specified purpose. This does not allow BLM to take civil or criminal action against uses, such as wandering from the easement, camping more than 24 hours or fishing from the easement, when the uses do not interfere with the retained rights (the use of the easement). This information is included in the Proposed RMP/Final EIS (pp. 41, 42, 187).
0355-38	On page 471 under Locatable Minerals, the statement is made that "Impacts to fisheries from mining activities are increased erosion, impacts associated with infrastructures (roads) and toxic pollution. This is not correct. Road construction requires strict controls and the use of silt curtains and NPDES discharge requirements do not allow any discharge that could be "toxic pollution". The following paragraph correctly states that the impacts are expected to be minor and short term.	As stated, the final conclusion, based on application of Required Operating Procedures is that "impacts are expected to be short-term and small, and are not expected to have a significant impact to fish or fish habitat in the long-term."
0371-2	Salmon is maybe as much of a valuable resource in my opinion as minerals and is sustainable, especially the Copper river drainage. I do not think any shed ways to this drainage should be sacrificed or if any mining or drilling were to take place here it should come under close scrutiny.	No watersheds to the Copper would be sacrificed under any alternative considered in the Draft RMP/EIS. The Draft RMP/EIS considers a wide range of protective measures for anadromous rivers and streams in the alternatives…from maintenance of withdrawals that would prohibit mineral entry or leasing in alternative C to site-specific ROPs and stipulations that would be applied to any permitted activity.
CULTURAL AND PALEONTOLOGICAL RESOURCES		
0020-4	Identifying archeological sites, too, does not protect them, all it does is open them up to destruction. Tangle Lakes is the perfect example of our archeological sites being trampled on. So a goal, you know, you need to not only manage the trails but minimize the damage being done to our cultural resources up there.	BLM recognizes and has documented impacts to archaeological sites within the Tangle Lakes Archeological District (TLAD). See page 171, Draft RMP/EIS. This drove the need for designated trails in the area, to try and minimize impacts to the resource. BLM is committed to continue managing the area to protect cultural resources (page 79, Draft RMP/EIS).

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0020-21	Paleontological resources, you haven't even inventoried them. How do you know what's out there. We want that inventoried. We're losing our cultural identity every day because of the lack of protection on our archeological sites. Every day. I mean the glacier up there is receding faster than anyone can study and, yet, the people that are up there trespassing are taking things. They're taking our artifacts. That's our history that's being robbed right out from under our noses.	The Draft RMP/EIS recognizes paleontological resources (pages 270-272) and the need to increase inventory and knowledge about them (page 73, Cultural Resources, 4th bullet statement). Theft of artifacts is a crime. If you have specific information on this activity occurring, BLM law enforcement rangers would be willing to follow up on your concern.
0020-25	Our subsistence dependent lifestyle is currently damaged by, and will continue to be damaged by direct damages to our archeological sites. Some of the sites we have had to identify and once we do access must be provided. The only problem is nobody protected the sites. We have archeological sites up at Tangle Lakes that have been thoroughly damaged. Trespassers up there have burnt the lodges down for firewood.	The Draft RMP/EIS recognizes cultural resources (pp. 252 - 279) and the need to increase inventory and knowledge about them (p. 73, Cultural Resources). Theft or destruction of artifacts is a crime. If you have specific information on this activity occurring, BLM law enforcement rangers would be willing to follow up on your concern.
0164-34	Known and potential cultural sites and resources must be protected and their status monitored throughout any resource development. Ahtna Inc. requests a cooperative agreement between the State, BLM, and Ahtna Inc. to protect and review the areas that are of cultural significance to the Ahtna People.	BLM is committed to protection of cultural resources, as stated in our goal (page 72, Draft RMP/EIS). We are also committed to expanding our knowledge of known cultural sites through increased inventory and monitoring (page 73, Draft RMP/EIS). BLM is currently working with Athna on a Memorandum of Understanding, one facet of which would facilitate protection and review of culturally significant areas.
0164-46	The Draft Plan must discuss the paleo/cultural significance of Lake Ahtna and include measures for the monitoring and preservation of cultural sites discovered.	This is identified (page 73 of the Draft RMP/EIS) as a specific inventory and monitoring need.
0312-135	The following areas are identified as historical Native subsistence sites by local experts in Yakutat: • Galyax-Kaagwaantaan • Teikweidi' Bear House • Kwa'ashk'i Kwaan • Telkweidi' Drum House • Lukaax adi- L'uknax.adi •	Thank you for the information. A description of the prehistory and history of the Bering Glacier-Icy Bay Region is included on page 255 of the Draft RMP/EIS. However, your specific information will be added to the data collected through contract as part of this planning effort and will be used in future coordination in implementation level planning efforts. BLM's Preferred Alternative (Alternative D) proposes management for the area

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	Shungukeide While not all of these sites are located on BLM administered lands, certainly the management decisions of BLM lands will affect them. Please prioritize the protection of the natural and cultural resources on BLM lands in the Bering Glacier-Icy Bay region.	to protect and enhance the ecological integrity of the Bering Glacier area.
0312-136	Though it is not brought up in this land use planning document, we support the recent creation of the ½ mile corridor around Paxson Lake for protection based on archeological and historical significance.	It is actually listed as a decision under Alternatives B, C, and D, under Recreational Withdrawals (page 106, Draft RMP/EIS). Thanks for your support.
0354-11	[T]he paleo/cultural values of Lake Ahtna must be monitored/assessed.	This is identified (page 73 of the Draft RMP/EIS) as a specific inventory and monitoring need.
0354-13	Per page 270, there is no systematic inventory of paleontological resources and no way to track loss of cultural information. Ahtna's cultural archeological site at Tangle Lakes (dated over 10,000 years old) and other historical sites have been destroyed and measures to protect sites must be evaluated.	Please see response to comment 0020-21.
0354-33	Set aside special areas of interest, utilizing the history of the area without compromising archeological sites. Establish enforceable penalties for destruction of historic sites. Need research budget to pay local elders for knowledge that will disappear if not captured.	Areas of archeological significance have been identified in the past by BLM (TLAD), with a management emphasis for protection of cultural resources. Enforceable penalties for destruction of historic sites are in place. And…during this planning process, BLM contracted with Dr. James Kari to work with the Ahtna people in identifying culturally important sites and areas.
0355-40	Also on page 477, the references to negative impacts on archeological resources fails to recognize the laws and regulations already in effect that deal with such issues.	Chapter 4 of the Draft RMP/EIS (includes page 477) described general impacts to cultural resources from proposed management actions or allowable uses, by alternative. Required Operating Procedure Cultural-a-2 on page 622 describes the laws and regulations that cultural resource and conservation will be consistent with: 1) Sections 106, 110, and 101d of the Historic Preservation Act, 2) procedures under BLM's 1997 Programmatic Agreement for Section 106 compliance, 3) the BLM's 1998 Implementing Protocol in Alaska between the BLM and the Alaska State Historic Preservation Officer, 4) Archaeological Resources Protection Act (ARPA), and 5) Native American Graves Protection and Repatriation Act (NAGPRA).
0386-5	Also in the plans are the protection of the culture areas, you know, I'm really happy to hear that the Paxson area around the lake on	Thank you for the comment and information. As stated in the Draft RMP/EIS on pages 72 and 73, BLM is committed to protection and inventory of cultural sites. During this planning process, BLM contracted with Dr. James Kari to work with the Ahtna people in

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	that half a mile corridor has been implemented because those areas unknown to most people, including the Native community, there was -- the elders have told me there was two villages up along that lake there. One on the north side and one on the south side and they were very huge villages. There's also a village that used to have been right on the Tangle Lakes -- banks of the Tangle Lake area. And so those areas need to be protected in regards to some of the culture things that, you know, there may be some graves sites and stuff in those areas that needs to be further looked at.	identifying culturally important sites and areas. This data will be used in future consultation and project planning to provide greater protection of cultural sites.
VISUAL RESORUCES (VRM)		
0020-18	The Mentasta area is considered a Class IV, we want it to be reclassified to Class I, all lands adjacent to Mentasta and AHTNA lands should be Class I on visual resources. We don't want you to have the authority to put up oil rigs, mining camps and all those up there, those need to be protected areas.	Alternative C in the Proposed RMP/Final EIS will be changed so that BLM-managed lands within the viewshed of the Glenn Highway (Tok Cut-off road) are managed under Class III VRM objectives.
0312-53	We recommend that the preferred alternative adopt VRM Class I for the Bering Glacier, especially if the RNA proposal is adopted. These lands are adjacent to the 125-mile Bagley Icefield within Wrangell St. Elias National Park. VRM Class I management guidance for the Bering Glacier will guarantee viewsheds consistent with the adjoining federally designated Wilderness area.	Based on the criteria listed above (high quality scenic rating, high sensitivity, and seldom seen distance class) the Bering rated as a VRM class II. It is considered as Class I under alternative C.
0312-56	If the proposal to pursue designation of the Denali Highway as a Back Country Byway is adopted in the Final RMP, we recommend that the associated VRM standards for this area will reflect the BLM's commitment to protect and enhance the current high scenic values present along this corridor.	Alternative D (the preferred) would manage the Denali Highway area as a Class II viewshed, with objectives to retain the existing character of the landscape. Alternative C considers management of the area as class I, with objectives to preserve the existing character of the landscape.

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0312-57	If the Delta Range SRMA or Tiekel SRMA are adopted in the Final RMP, we also recommend assigning VRM Class II to the areas in order to retain and preserve the existing undeveloped characteristics of the visual resources, particularly within the Augustana and Canwell subunits, and the Tonsina north and south subunits.	Management under VRM Class I or II for the viewsheds of these areas is considered in alternative C of the Draft RMP/EIS. Please keep in mind that the Delta and Tiekel SRMAs, under the preferred alternative, would be entirely within the pipeline/utility corridor. Don't forget the primary purpose for which those lands were withdrawn (to provided a transportation/utility corridor). We cannot logically adopt VRM objectives that would prohibit or unreasonably restrict activities consistent with the purpose of the withdrawal.
0312-58	We are concerned that in the preferred alternative, BLM proposes to allow extensive surface disturbing activities to occur on lands that can currently be classified through Scenic Quality Ratings as meeting VRM Class I and II objectives, especially when compared on a national scale to public lands in the contiguous United States.	Please see response comment 0312-61.
0312-59	We request that BLM uphold strong visual resource management goals, especially Class I, II and III assignments. These principles will minimize the occurrence of high levels of change to BLM lands, particularly through activities which would diminish scenic values to a point where major rehabilitation would be the next necessary step.	Class I, II, and III objectives are described on page 273 of the Draft RMP/EIS. Assignment of these classes and adherence to these objectives will not necessarily decrease the occurrence of development activities, but it will mitigate the impacts of development activities on scenic quality.
0312-60	Above all, we encourage BLM to require permitted operators to strive to minimize the impacts of surface-disturbing activities on the scenic resources of all public lands, especially along the Gulkana National Wild River, the Delta National Wild and Scenic River, and lands adjacent to the Denali Highway and the Richardson Highway. Any permitted activities must be designed to blend with the landscape so that they do not attract attention or visually clash with the adjacent scenery.	The areas or viewsheds from the highways you mentioned would be managed under Classes I, II, or III under the preferred alternative, with objectives consistent with your comment.
0312-61	Recommended VRM Classes: VRM Class I: Gulkana and Delta WSR corridors and the Bering Glacier; VRM Class II: Gulkana and	VRM Classes are based on three considerations: 1) Scenic Quality; 2) Sensitivity Level; and 3) Distance zones. Distance classes were developed using viewsheds from 21 different well-used travel routes throughout the planning area (including rivers and trails).

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	Delta WSR corridors viewshed; Denali Highway viewshed; Delta Range SRMA, especially Augustana and Canwell subunits; Tiekel SRMA, especially Tonsina North and South subunits. All other BLM-managed lands should be managed to uphold the objectives of VRM Classes II and III in order to retain and preserve the existing undeveloped characteristics of the visual resources.	Overall VRM Class is developed by combining these three considerations. Because of the obvious scenic quality in the planning area, all areas rated out as moderate to high in scenic quality. Amount of use is a factor used in considering sensitivity, so it is possible for a highly scenic area, such as the Bering Glacier, to rate out as a Class II or III VRM class, based on lower sensitivity rating or a distance class of Seldom Seen. This is why some of the area, even under Alternative C, is classed as VRM Class IV (combination of moderate scenic quality, low sensitivity, and seldom seen distance class). BLM has not significantly changed these VRM classes in the Proposed RMP/Final EIS because alternative C does consider most of your comment request. We will not arbitrarily change all areas from Class IV to Class III.
0329-51	The proposed Visual Resource Management Classes are puzzling. At risk of sounding over-appreciative of this region, even the designations in Alternative C don't match reality. How can Klutina Lake be only Class IV? And the proposed alternative designates the Bering Glacier country only Class II?! We would support knocking the proposal in Alternative C up a notch. To call the Bering glacier country a class III viewshed is patently absurd. The Denali highway is way prettier than mediocre. How were these VRM classes arrived at? The VRM improperly assumes that the only visual resources, are those seen from a car on the highway. However, much of the area is reached by boat or plane, not car.	Please see response to comment 0312-6.
0354-12	All Native-selected lands and 17(b) easements must be protected and classified as Class I Visual, where "change to the characteristic landscape very low and not attract attention".	17(b) easements would not get a VRM class because they are easements across non-BLM managed lands. For your comment on Native-selected lands, see our response to comment 0312-61 on how VRM classes were determined.
0392-2	We support Class I visual resource management for the designated corridors of the Delta and Gulkana Rivers. And we also support Class II visual resource management for the adjacent lands within the view sheds of these rivers.	Management under Class I for the Delta and Gulkana river corridors is considered under both alternatives C and D. Management of their viewsheds under Class II is also considered under both C and D.
0392-3	For visual resource management I believe we're also opposed to any Class IV VRM	Please see response to comment 0312-61 and comment 0020-18.

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	designation within the planning area. Our feeling that is too lax of a management designation for these lands that are currently in pristine condition.	
AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)		
0060-2	So I would stress that some of the lands that had been examined as, I'm going to get the acronym wrong, but as ACEC land in the initial scoping, should be put back on the table for that status.	ACEC designations are considered under alternative C in the Draft RMP/EIS. Designations are considered in Alternative D for the West Fork and Nelchina calving areas, if lands are retained in federal ownership in manageable, contiguous blocks. For the Delta Bison area, a cooperative Habitat Management Plan is considered under Alternative D.
0060-14	Protecting the calving grounds of the Nelchina Caribou herd is crucial to subsistence hunting in this ACEC as well as to maintaining the ecological integrity of the area. Not only should oil and mineral development and new construction not be allowed in this area, but we favor allowing ORV access between to 10/15 to 4/15 only. Even during the winter months, access should be disallowed if there is not adequate snow cover or if freeze depths are too shallow to protect soils and forage. We also favor disallowing SRPs during calving season (5/1 to 6/15).	Alternative C of the Draft RMP/EIS considers and analyzes your suggestions for the area, with the exception of the seasonal closure to OHVs (alternative C would limit OHVs to designated trails). Very few OHV trails currently exist in the area.
0060-17	We support the designation of 827,000 acres of the Bering Glacier as a Resource Natural Area to protect the unique ecological values associated with the glacier and the glacier forelands, as described in the preferred alternative. However, the Preferred Alternative also proposes allowing oil and gas leasing and locatable mineral entry to occur on the eastern 1/3 of the Bering Glacier RNA, a use that is incompatible with RNA designation.	The decision to lift the withdrawal on the eastern 1/3 of the area in the preferred alternative is based on the following reasons: 1) Most research activities are focused on features associated with the glacier itself, the eastern 1/3 of the area is un-glaciated; 2) the likelihood of mineral development in the eastern 1/3 of the area is very low due to the remote nature of the area, difficult access, and extreme topography; and 3) protection provided under the stipulations and Required Operating Procedures described on pp. 610-629 of the Draft RMP/EIS.
0060-20	The West Fork of the Gulkana River provides important breeding grounds for Trumpeter Swans and other waterfowl; nesting sites for bald eagles and osprey; moose habitat; and spawning grounds for sockeyes and kings. All	Alternative C of the Draft RMP/EIS considers maintenance of withdrawals that would keep the area closed to mineral entry or mineral leasing. No FLPMA or R&PP leases would be considered for the area. The OHV dates (5/1 to 8/31) were chosen based on the season of trumpeter swan breeding and nesting. If carrying capacities for SRPs were determined in implementation planning under Alternative C, areas of highest value

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	of these uses are incompatible with mining, drilling, logging, and other commercial developments; as such, these uses should be disallowed. In addition, we recommend that OHV use should be restricted from 4/15 to 10/15 with adequate snow cover and freeze depths, rather than only from 5/1 to 8/31 as stated. In formulating carrying capacities for SRPs, areas of highest value as nesting sites for swans and raptors should have a designated carrying capacity of zero during the nesting season.	as nesting sites for swans and raptors would be seasonally excluded from commercial operators.
0061-1	These large tracts of land [ACECs], as has been said, are really critical, but the notion that it's calving grounds and nesting areas is particular important. And I just want -- and I haven't looked at all the different alternatives for the motorized use of the different areas, but want to just emphasize that the seasonality of motorized use in terms of reproduction is always a critical issue and that gestation should also be considered part of that phase because stress during gestation, of course, is problematic.	Alternative C of the Draft RMP/EIS considers ACEC designations for the Delta Bison calving area and Nelchina caribou calving area that would limit motorized use to designated trails, located to avoid critical calving areas. Effects of these actions on wildlife are described (by alternative) on pp. 434-461 of the Draft RMP/EIS.
0080-7	Further be it resolved, the Southcentral Regional Council recommends establishment of Areas of Critical Environmental Concern (ACEC) as described in Alternative C, to protect habitat for the Nelchina caribou, migratory waterfowl, and trumpeter swans.	ACEC designations are considered under Alternative C of the Draft RMP/EIS. Designations are considered in Alternative D for the West Fork and Nelchina calving areas, if lands are retained in federal ownership in manageable, contiguous blocks. For the Delta Bison area, a cooperative Habitat Management Plan is considered under Alternative D.
0086-2	I support BLM's proposal for a 827,000 acre Bering Glacier Research Natural Area but I oppose opening one-third of this RNA to the exploration and for oil, gas, and locatable minerals. Such land uses are incompatible with the goals of the RNA.	Alternative D of the Draft RMP/EIS would manage the area as a Research Natural Area, with an emphasis on protection of the unique ecological values of the area. Alternative D would lift the existing withdrawal on the eastern 1/3 of the area. Exploration and development on the BLM managed lands in this area are highly unlikely due to rough topography, very little existing infrastructure, and very limited access.
0097-2	Further we support Alternative C for its creation of the Delta Bison Calving, Nelchina Caribou	Thanks for your comment. A "limited" designation for most BLM-managed lands is also considered under alternative D of the Draft RMP/EIS.

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	Calving, and West Fork Areas of Critical Environmental Concern (ACEC) and Bering Glacier Research Natural Area (RNA). These designations set forth management actions which put constraints on summer OHV usage, such as limiting use to designated trails.	
0167-2	I am opposed to the proposal to open a third of the Bering Glacier Research Natural Area to oil, gas, to mineral exploration. I believe the natural values of these wild areas far outweigh any benefit from extractive industry.	Thanks for the comment. Alternative C of the Draft RMP/EIS considers maintenance of the withdrawal on the entire area that would prevent mineral entry or mineral leasing.
0173-6	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. The 1979 Alaska Legislature established the 90,000-acre Delta Junction State Bison range. The ADF&G actively manages and limits the "pre-calving" herd size to 275-300 bison with a hunting permit program. Since herd size is actively managed, an ACEC is not justified.	The ACEC designation is considered under alternative C of the Draft RMP/EIS. An ACEC would not be considered under alternatives A, B, or D. In alternative D, a cooperative Habitat Management Plan would be pursued between BLM and ADF&G.
0173-7	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … Documentation of mining claims and the presence of minerals in the proposed area should be developed and provided in the Plan. It is unclear at this time whether the BLM is unencumbered.	See response to comment 0173-6. In addition, a map showing federal mining claims will be included in the Proposed RMP/Final EIS (Map 50, Mineral Terranes and Producing Placer Districts). And, this area is unencumbered BLM land.
0173-8	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … The area should be opened to entry for Locatable Minerals and Leasable Minerals (Oil and Gas and Coal). Entry should be open	See response to comment 0173-6. Your suggestion for opening the area to entry for locatable and leasable minerals is considered in Alternative B. Alternative D (the Preferred Alternative) would maintain the current withdrawal (PLO 5150) where locatable mineral entry is closed in the inner corridor and open in the outer corridor.

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	for both the outer and inner corridors.	
0173-9	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … Lands and Realty should grant FLPMA and R&PP leases. FLPMA 302 permits and Rights-of-way should be granted.	See response to comment 0173-6. Leases and permits would not be granted only under alternative C in the Draft RMP/EIS. Alternative D would grant leases and permits, consistent with protection of the bison calving area habitat.
0173-10	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … Alternative C is unjustified and should not be adopted. BLM must manage its lands for multiple use. This alternative further restricts multiple use.	The Delta Bison Calving Area is only designated as an ACEC in Alternative C of the Draft RMP/EIS (see pages 80 and 83).
0173-11	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures"	See response to comment 0173-6. Also, your suggestion for road construction is considered under Alternatives A and B of the Draft RMP/EIS.
0173-12	Nelchina Caribou Calving Area: It is totally inappropriate to include State and Native selected lands in any designation of an ACEC. These selected lands will in all likelihood become State or Native lands in the future. Therefore, no restrictions should be imposed on these lands that could complicate transfer or management of the lands.	ACEC designation for this area is considered in Alternative C of the Draft RMP/EIS. Designation as an ACEC and the measures described under alternative C would not create an encumbrance on State-selected lands. In addition, the measures considered for the area that are considered under alternative D are completely consistent with measures described for protection of the Nelchina caribou calving area in the State (DNR) Susitna Area Plan.
0173-13	Nelchina Caribou Calving Area: a. the existing ANCSA d(1) withdrawals should be revoked for Locatable Minerals and the area opened up for all minerals. b. the existing ANCSA d(1)	Your suggestion is considered and analyzed under Alternatives B and D of the Draft RMP/EIS.

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	withdrawals should be revoked for Leasable Minerals (Oil and Gas) and the area opened up for recovery of oil and gas resources. c. the existing ANCSA d(1) withdrawals should be revoked for Leasable Minerals (Coals) and the area opened up for leasing and development by all mining methods.	
0173-14	Nelchina Caribou Calving Area: The recovery of Mineral materials should be made available for permitting.	Your suggestion is considered in Alternatives A and B of the Draft RMP/EIS and is only seasonally limited in Alternative D.
0173-15	Nelchina Caribou Calving Area: Lands and Realty should grant FLPMA and R&PP leases. FLPMA 302 permits and Rights-of-way should be granted.	Your suggestion is considered under Alternatives A and B of the Draft RMP/EIS. Alternative D allows for these uses, consistent with protection of the calving area.
0173-16	Nelchina Caribou Calving Area: Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures"	Your suggestion is considered in Alternatives A and B of the Draft RMP/EIS. Also, proposals considered in Alternative D are completely consistent with measures described in the State (DNR) Susitna Area Plan for this management area.
0175-28	Pages 80, 81, and 84, Nelchina Caribou Calving Area, West Fork of the Gulkana. The State appreciates BLM's efforts to recognize state management intent for state selected lands as described in the Department Of Natural Resource's Area Plans for State Lands and other planning documents such as the ADF&G Bison Management Plan within the areas identified as the Nelchina Caribou Calving Area, the West Fork of the Gulkana proposed ACEC area, and the Delta Bison Calving Area. To a great extent, management strategies proposed for the Nelchina Caribou Calving Area and the West Fork of the Gulkana (trumpeter swam breeding habitat) are consistent with management strategies identified in the Susitna Area Plan and the Copper River Basin Area Plan. However, as	Thanks for the comments. During this planning process, ACEC proposals were researched for the area using, as one source of information, State (DNR) area plans. BLM is committed to continuing to work with the State in implementation of this RMP.

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	indicated in previous comments, there area some issues identified within the Implementation-level Considerations described in this document with which the State has concerns. By addressing these issues through implementation-level planning we believe that many of these concerns can be successfully resolved.	
0175-55	Page 595, Nelchina Caribou Calving ACEC. We disagree with the Bureau's restrictions to exclude all airstrip development in Alternatives C and D. In the Department of Natural Resources Susitna Area Plan for the Nelchina Public Use Area, "airstrips and appropriate landing patterns shall be established in consultation with DNR and ADF&G to minimize adverse effects on caribou." We request the Bureau revise the Area of Critical Environmental Concern to reflect this information.	Prohibition of new airstrip construction will remain in Alternative C. Alternative D of the Proposed RMP/Final EIS will be consistent with your suggested wording, under "Interim Management" (page B-6, Appendix B).
0175-56	Page 603, Bering RNA. The State objects to the use of carrying capacity as a means of limiting Public Use Cabins. Special Recreation Permits within the range of Alternatives for the Bering RNA should clearly identify the management objectives and provide justification for an RMP decision to disallow helicopter supported services. Please refer to previous correspondence from the State regarding carrying capacity and comments included earlier in this correspondence regarding limitations. The State was unable to locate a justification for the elimination of helicopter-supported services.	The wording will be changed in the Proposed RMP/Final EIS to say "Public use cabins may be considered, consistent with objectives of the RNA" (B-16, Appendix B). These objectives will be clearly described in the Proposed RMP/Final EIS for the Bering Glacier RNA for alternative D (pp. 93, 96 Proposed RMP/Final EIS). The objectives will include justification for the elimination of helicopter-supported commercial recreational activities.
0185-5	The three Areas of Critical Environmental Concerns (ACEC): Delta Bison Calving, the Nelchina Caribou calving and the West Fork trumpeter swan and waterfowl habitat as	The Nelchina caribou calving area and the West Fork trumpeter swan area were not considered as ACECs in the preferred alternative because they are mostly State and Native-selected lands. Alternative D does say (pages 594 and 598, Draft RMP/EIS) that if sizeable contiguous blocks of land are left in federal ownership after conveyance,

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	discussed in Alternative C should be included in the final plan. Why were these areas not included in the BLM preferred alternative?	ACEC designation would be considered. The Delta Bison calving area was dropped from Alternative D because most of the area would be managed under the Delta Range SRMA and a cooperative Habitat Management Plan for the calving area is considered under Alternative D of the Draft RMP/EIS.
0306-1	The three Areas of Critical Environmental Concerns (ACEC): Delta Bison Calving, the Nelchina Caribou calving and the West Fork trumpeter swan and waterfowl habitat as discussed in Alternative C should be included in the final plan. Why were these areas not included in the BLM preferred alternative?	The Nelchina caribou calving area and the West Fork trumpeter swan area were not considered as ACECs in the preferred alternative because they are mostly State and Native-selected lands. Alternative D does say (pp. 594 and 598, Draft RMP/EIS) that if sizeable contiguous blocks of land are left in federal ownership after conveyance, ACEC designation would be considered. The Delta Bison calving area was dropped from alternative D because most of the area would be managed under the Delta Range SRMA and a cooperative Habitat Management Plan for the calving area is considered under alternative D.
0306-5	I support designating the 827,000 acre Bering Glacier Research Natural area. The eastern 1/3 of the Bering Glacier Natural Research Area should be withdrawn from oil and gas leasing and locatable mineral entry as proposed in your preferred alternative.	Actually, the preferred alternative proposes lifting the existing withdrawals in the eastern 1/3 of the area, which would allow for mineral entry or mineral leasing, although the likelihood is very low. Alternative C of the Draft RMP/EIS considers retaining the withdrawal on the whole area.
0312-2	We support the proposal to designate the Bering Glacier as a Research natural Aras for the protection of "unique ecological values" of the glacier and forelands and for providing continued scientific research opportunities. Please apply management guidelines and restrictions to these lands that are consistent with those of the adjacent Wilderness lands of Wrangell St. Elias National Park and Preserve.	Alternative C of the Draft RMP/EIS considers the strongest protective measures for the area. However, even alternative C does not prohibit motorized use in the area. It does limit OHV use to designated trails. There are few OHV trails in the area, and they are used to access subsistence resources.
0312-3	We support the entire 1,000,316 acres of BLM administered lands of the Bering Glacier region to be included in the boundaries of the Research Natural Area. If the adjacent selected lands are ultimately conveyed to the State of Alaska, interim protection will guarantee that the State receives the selected lands in the highest quality resource condition afforded by the RNA designation.	Thanks for the comment. Your suggestion is considered in Alternative C of the Draft RMP/EIS. Under alternative D, State and Native selected lands adjacent to the Bering Glacier area would be managed as a Research Natural Area if they are retained in long-term federal ownership.
0312-4	We request that BLM not recommend lifting the ANCSA 17(d)(1) withdrawals on the eastern	Thanks for the comment. Maintenance of the d(1) withdrawals for the entire area is considered and analyzed in alternative C of the Draft RMP/EIS.

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	one-third of the RNA which currently prevent mineral leasing or locatable mineral entry. We request that BLM recognize the importance of the pristine wildlife habitat and abundant subsistence resources traditionally used and relied upon by the native peoples of the region. Many historical sites were identified in the Coastal management Program, such as the Cape Yakatage Village, Cape Yakataga Ravens House, Simonoesko in the Cape Suckling area, trade route from the interior, from Duktoth River, Guyot Bay or Mud Bay, a pre-historic Gineixkwan camp west of Icy Bay and the village on the Kaliakh known as Ghalyaxh that are within the planning area, as identified by local experts. We believe that maintaining the withdrawals throughout the entire designated area is an essential management tool capable of helping to achieve the stated goals of the Bering Glacier Research Natural Area.	
0312-5	In an attempt to apply consistent management standards with adjacent land managers, we recommend that BLM designate the Delta Bison ACEC. Protection for the bison calving habitat present on these BLM lands would offer ecosystem-level management for this species and facilitate strong interagency cooperation.	ACEC designation is considered in Alternative C of the Draft RMP/EIS. Under Alternative D, a cooperative Habitat Management Plan with ADF&G would be pursued.
0312-6	We recommend adding the following seasonal limitations to the Delta Bison calving ACEC: To protect calving bison, no surface disturbing activities exceeding fourteen days should be allowed from 5/1 to 6/30.	This Required Operating Procedure is already considered under Alternatives B, C, and D. See ROP-F&W-b-2 (page 614, Draft RMP/EIS).
0312-7	We recommend adding the following seasonal limitations to the Delta Bison calving ACEC: Limit OHV use to designated trails during the snow-free months.	This is considered in Alternatives C and D of the Draft RMP/EIS.
0312-9	We support the proposal within Alternative C to	Thank you for the comment. Alternative C of the Draft RMP/EIS proposes an ACEC

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	establish a 545,000 acre ACEC on lands adjacent to and including the West Fork Gulkana National Wild and Scenic River. The above stated request regarding interim protection of state-selected lands and coordination with ADF&G for the management of wildlife habitat applies to the West Fork ACEC proposal as well. According to the U.S. Fish and Wildlife Service's 2001 census, this area is nationally significant trumpeter swan habitat, containing 23% of the statewide trumpeter swans and a large percentage of the world's known population of trumpeter swans.	designation as you describe. Alternative D would not designate the area as an ACEC but would adopt measures as described in the table on page 598 as well as ROPs for protection of swans and swan habitat. Alternative D would also consider designation of an ACEC in the area if land were retained long-term by the federal government.
0312-10	We recommend that these additional seasonal limitations are also incorporated into the West Fork ACEC: To protect trumpeter swans and other waterfowl activities or surface use exceeding fourteen days should not be allowed within 1/4 mile of historically active nests from 4/1 to 9/15.	This Required Operating Procedure is already considered under Alternatives B, C, and D. See ROP-F&W-b-1 (page 613, Draft RMP/EIS). However, dates in the ROP are 5/1 - 8/31.
0312-11	We recommend that these additional seasonal limitations are also incorporated into the West Fork ACEC: To protect raptor nests, activities or surface use exceeding fourteen days should not be allowed within 1/4 mile of historically active nests from 4/1 to 9/15.	This Required Operating Procedure is already considered under Alternatives B, C, and D. See ROP-F&W-b-4 (page 614 of the Draft RMP/EIS). Dates in this ROP are 4/1 to 8/31.
0312-12	We recommend that these additional seasonal limitations are also incorporated into the West Fork ACEC: To protect critical moose habitat, no designated trails or new public use cabins or surface disturbing activities should be allowed from 10/15 to 3/31.	Designation of snowmachine trails was not considered for this area because the current level of use is low and, because of the black-spruce dominated vegetation, most snowmachine use is limited to existing winter trails. Implementation-level consideration for both alternative C and D include consideration of designated trails for snowmachines IF research clearly shows definitive impacts to quality of moose winter range or significant impacts to predator/prey relationships with increased use (p. 36, Draft RMP/EIS). New public cabins are not permitted in the area under either alternatives C or D. And, surface disturbing activities exceeding 14 days are prohibited by ROP-F&W-b-3 (p. 614).
0312-13	We recommend that these additional seasonal limitations are also incorporated into the West Fork ACEC: No surface disturbing activities	Protections for anadromous streams are provided in Alternatives B, C, and D of the Draft RMP/EIS by the Required Operating Procedures, specifically ROP-F&W-a-6, ROP-F&W-a-10, ROP-Water-a-1, and ROP-Water-c-2, which provide a 500 foot buffer around

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	should be permitted within 400 feet of all anadromous streams and lakes during open water periods.	anadromous streams.
0312-15	We recommend that the following seasonal limitations be incorporated into the Nelchina Caribou Calving ACEC: To protect calving caribou, no surface disturbing activities or activities exceeding fourteen days should be permitted from 5/1 to 6/15.	Please see ROP-F&W-b-2 (page 614, Draft RMP/EIS) which would be adopted under alternatives B, C and D.
0321-9	We encourage the ACEC designation for the following areas listed in Alternative C: -The Delta Bison Calving ACEC (19,000 acres) for protection of bison calving area and restoration or maintenance of habitat north of Summit Lake. -The Nelchina Caribou Calving ACEC(389,000 acres) for protection of caribou calving area south of the Susitna River. -The West Fork ACEC(490,000 acres) for protection of trumpeter swan and waterfowl habitat and wetlands adjacent to the West Fork of the Gulkana River.	Thank you for the comment. Alternative D of the Draft RMP/EIS also considers protective measures (without designation) for these areas.
0323-9	EPA strongly supports special management of areas within the East Alaska planning area to protect subsistence, recreational, fish and wildlife, historical or scenic values. … On the basis of information presented in the Draft EIS regarding the importance of these wildlife habitat areas, EPA recommends BLM include these two areas [West Fork Gulkana and Nelchina caribou calving area] as ACECs in the final Preferred Alternative.	Thanks for the comment. Alternative D of the Draft RMP/EIS considers protective measures for these areas without the ACEC designation (see tables pp. 591 - 600, Draft RMP/EIS). For the West Fork and Nelchina caribou areas, Alternative D considers ACEC designation if lands in the areas are retained in federal ownership.
0323-10	The Draft EIS also documents and recognizes the unique natural features of the Bering Glacier. EPA supports the Preferred Alternative's proposal to designate unencumbered BLM lands in the Bering Glacier area as a Research Natural Area (RNA) and	Thanks for the recommendation. It is included in the Preferred Alternative (D) of the Draft RMP/EIS.

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	we recommend that this RNA be included in the final Preferred Alternative.	
0323-11	EPA also recommends that BLM consider additional protection, including ACEC designation, for critical waterfowl habitat and wetlands in the West Fork Area if this area remains under federal ownership.	This is exactly what is described in the Preferred Alternative (Alternative D) of the Draft RMP/EIS, if lands are retained in Federal ownership. Thanks for your support.
0329-7	We are extremely disappointed you have ignored our nomination of the Copper River Watershed as an Area of Critical Environmental Concern (ACEC), as allowed under FLPMA. 43 USC 1712. BLM Manual 1617. This alternative was present in the original (blue) version of the draft alternatives, but inexplicably disappeared by the time the modified version came out. In the Draft EIS, it isn't even included under the "Alternatives Analyzed but Not Considered in Detail." Why not? Please designate all BLM-managed lands and tributary streams within the Copper River Watershed as an ACEC. ... The Copper River Watershed is clearly eligible on the basis of the Wild Copper River Salmon resource. Please consider designating the Copper River Watershed an ACEC. This is justified, including for the following reasons: ...ACEC designation would yield real benefit to salmon, and the watershed. A watershed-level ACEC is the best way to manage the region for the major issues presented in the Draft EIS because it would: Encourage watershed-level management; Enable habitat protection; and Benefit regional tourism, fisheries marketing. Consideration of the watershed scale is critical in regards to salmon management. … The Draft EIS/RMP takes the view that the state of Alaska will manage salmon to be sustainable, and that has nothing or little to do with BLM actions. This	A Copper River Watershed ACEC was considered during the planning process, but was eliminated from detailed analysis for the following reasons: a) BLM currently manages only approximately 15% of the lands within the watershed, 50% of which are selected lands that will probably not be retained under federal management; b) strong protective measures will be continued along the Gulkana River, BLM's largest piece of unencumbered land in the watershed, through the proposed SRMA designation and continued management as a Wild and Scenic River; c) protective measures will be put into place through measures identified for the West Fork area and the Tiekel SRMA (see tables pp. 598 and 583); and d) application of ROPs and stips for permitted activities apply strong protective measures for anadromous streams. This information has been added to the Proposed RMP/Final EIS under "Alternatives Analyzed but not Considered in Detail" (page 39).

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	approach is misguided. "The integration of traditional salmon harvest management with habitat monitoring and protection is essential to the sustainable use of Alaska's salmon resources." (Mundy 1998, p.31) In fact, the BLM plays a key role in sustainable salmon management. ... an ACEC designation would be consistent with and help implement the Alaska Sustainable Salmon Fisheries Policy. ... The BLM has an affirmative duty to maintain sustainable salmon harvest, for subsistence fishers. It is not O.K. to just say, "ADF&G will deal with it." Federal laws too provide for salmon habitat protection. FLPMA requires land be managed "without permanent impairment of the productivity of the land and the quality of the environment." 43 USC 1702(c). FLPMA requires land be managed according to multiple use, sustained yield. 43 USC 1701 (a)(7); 43 USC 1712(c)(1).	
0329-14	Designating this place [Bering Glacier RNA] for large-scale industrial extraction is absurd. You'd have an easier time trying to mine the moon. The impact of even just exploration here would be substantial, and the impacts of development would necessarily be immense. Any serious development of minerals, oil or gas in the Bering Glacier region necessarily would involve extensive development and infrastructure along the coast. A road would need to be maintained, and a port established, both of which would require heroic effort. Icy Bay is the only possible port site along this stretch of coast. It is not true that the land buffer between BLM lands and the coastline would protect coastal species, such as Kittlitz's murrelet, from the impacts of exploitation.	Alternative D of the Draft RMP/EIS does not "designate" the Bering RNA for "large-scale industrial extraction". It would manage the area as a Research Natural Area, with an emphasis on protection of the unique ecological values of the area. Alternative D would lift the existing withdrawal on the eastern 1/3 of the area. As you state, exploration and development on the BLM managed lands in this area are highly unlikely due to rough topography, very little existing infrastructure, and very limited access.
0329-16	We heartily support the Delta Calving ACEC,	Thank you for your comment. Please recognize that alternative D of the Draft RMP/EIS

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	as proposed in Alternative C, to protect the unique wildlife habitat and wildland recreation values here.	proposes that the area be managed as an SRMA, to maintain a diversity of recreation experiences. In addition, alternative D recommends developing a cooperative Habitat Management Plan specifically for the Delta bison calving area.
0329-18	We support the proposal in Alternative C [for the Nelchina caribou calving area ACEC]. This is an excellent example of how federal habitat conservation can help maintain sustainable subsistence harvest.	Thank you. Alternative D of the Draft RMP/EIS also considers measures to protect the area and would consider ACEC designation if lands in the area are retained in federal ownership.
0329-34	We are concerned that "refugia areas" for wildlife to escape humans are "disappearing from the landscape" due to OHVs. (p.434) This is a benefit of large ACECs, and larger blocks of managed land, as opposed to just using ROPs and stipulations.	Alternative D considers protective measures for these areas without the ACEC designation (see tables pp. 591 - 600, Draft RMP/EIS). For the West Fork and Nelchina caribou areas, Alternative D considers ACEC designation if any lands in the areas are retained in federal ownership.
0329-48	The best way to manage recreation here is to place the Copper River watershed in an ACEC. This would allow increased protection of the resources people come to see, and increased coordination with other managers.	Some of the BLM-managed portions of the Copper River watershed are considered as SRMAs in the Draft RMP/EIS (Gulkana SRMA, Tiekel SRMA).
0329-187	We are alarmed that, under Alternative D [for the Bering Glacier RNA], "Road construction would be permitted for resource development, with special consideration for protection of resource values identified for the area." (DEIS, p.46) What on earth does "special consideration" mean? More important, what good does it do? You are asking for trouble, to lock future managers into permitting a road across one of the least accessible, most dynamic landscapes in the world. Wouldn't you want to be able to say no?	Special consideration means that construction of the road would have to be consistent with objectives for management of the Research Natural Area, which are clearly described in the Proposed RMP/Final EIS for the Bering Glacier RNA for Alternative D (pp. 93 and 96).
0331-5	The three ACECs are a key component of Alternative C. Protecting wildlife is vital to us because they provide nutritious food for our tables, because they are a joy to see, and because they are part of healthy, functioning ecosystems. Alternative D is seriously flawed in failing to provide ACECs in spite of an ADFG	Alternative D considers protective measures for these areas without the ACEC designation (see tables pp. 591 - 600, Draft RMP/EIS). For the West Fork and Nelchina caribou areas, Alternative D considers ACEC designation if any lands in the areas are retained in federal ownership.

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	conclusion, not denied in the RMP/EIS, that "Refugia, areas inherently inaccessible to humans where wildlife populations could escape from the regular intrusion of humans, are disappearing from the landscape due to the proliferation and unmanaged use of OHVs." (RMP/EIS p. 434).	
0331-6	We support creation of the Bering Glacier Resource Natural Area as proposed in alternative C. Alternative D protects 112,000 fewer acres of land. We think it makes sense to include those state-selected lands, because there is a chance that the state will not take conveyance of them. If the state does take conveyance, no harm has been done.	Alternative D of the Draft RMP/EIS would manage the lands under the RNA designation, if they are retained long term in federal ownership.
0341-10	The Preferred Alternative proposes designating 827,000 acres of the Bering Glacier as a Resource Natural Area to protect the unique ecological values associated with the glacier and the glacier forelands (p.87). We support this option. However, the Preferred Alternative also proposes allowing oil and gas leasing and locatable mineral entry to occur on the eastern 1/3 of the Bering Glacier RNA. p.130-133. We do not support this, as the proposed increase fails to address potential impacts to salmon and salmon habitat.	A description of the likelihood of mineral or oil and gas development as well as potential effects from such development has been added to the Proposed RMP/Final EIS in Chapter 4, page 409.
0341-11	We support ACEC designations for any area critical to important wildlife species.	Page 275 of the Draft RMP/EIS explains what areas are considered as "suitable" for ACEC designations, under BLM's regulations. Alternative C considers designation of three different ACECs.
0342-3	The NPS supports the designation of the Bering Glacier Area as a Research Natural Area (RNA) and the measures to protect the unique ecological values associated with the glacier and glacier forelands as outlined in alternatives C and D. However, we support maintaining the locatable minerals and oil and gas leasing withdrawals under PLO 5173 as	Thanks for the comment. Please see response to comment 0086-2.

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	identified in alternative C. Alternative D would revoke PLO 5173 on the eastern 1/3 of the RNA allowing mineral entry and oil and gas leasing adjacent to the Wrangell St. Elias National park and Preserve. These activities could affect the nationally significant resources and values of the park and preserve.	
0345-1	We support the Areas of Critical Environmental Concern, the Special Recreation Management Areas and the Research Natural Area, which will help protect habitats and direct recreation in good directions	Thanks for the comment. These are considered, by varying degrees, under Alternatives C and D of the Draft RMP/EIS.
0355-17	Closure of the Delta Bison Calving Area (page 42) cannot be justified. The Bison population is not in danger. The Alaska Department of Fish & Game manages the herd very well without any closure or added restrictions.	No alternative considers "closure" of the Delta Bison Calving Area. Alternative C considers an ACEC designation, no new road construction, and OHVs limited to designated trails during the calving season. This is not a closure. Alternatives A and B don't consider any designation. Alternative D would implement a cooperative Habitat Management Plan, with some measures identified for protection of calving bison and bison habitat. We recognize that ADF&G manages the herd well. We are attempting to manage the habitat in a critical area so that they can continue to be successful in their management efforts.
0355-18	The Nelchina Caribou Calving area (page 43) discussion states "the same as under Alternative C". This is inconsistent and not correct. Under Alternative C no road building is allowed by in (a) it states that road construction would be permitted.	The wording "the same as under Alternative C" refers to the size of the area considered.
WILD AND SCENIC RIVERS		
0060-11	Alternative D, the alternative preferred by BLM, includes only one recommendation for designation as a Wild and Scenic River, although 24 river segments have been shown to meet eligibility criteria. There is no clear reason why these rivers have been removed from consideration; rivers should not be de-selected based on potential future land status. Thus, we ask that all 24 rivers be placed back under consideration.	See response to comment 0392-1.

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0070-2	I'd like to see the wild and scenic rivers maintained in current state. I'd like to see no encroachment on them. I'd like to see no bridges across them. No roadhouses next to them or hotels or whatever. I'd like to see those rivers maintained the way they are, they are good fishing and recreation opportunity and I'd like to keep it that way. If the State were to press for some type of bridge to mining access or whatever, I'd hope BLM would fight that and propose that whatever road access is available that they use that, as opposed to trying to bridge say the Delta River.	Thanks for your comment. This is also BLM's management intent in alternatives C and D of the Draft RMP/EIS.
0084-4	I urge you to reconsider your decision that the other 23 eligible river segments are not suitable for Congressional protection. Outstanding natural values were identified on all of these rivers and they also deserve long-term resource protection. Please strive to preserve the integrity of these river values through every administrative designation available.	See response to comment 0392-1.
0147-2	We support your decision that the other 23 eligible river segments are not suitable for Congressional protection. Outstanding natural values were not identified on all of these rivers and they do not deserve long term resource protection.	See response to comment 0392-1.
0159-6	I would request that the ROD contain a commitment to reexamine, after all conveyances have been made, the “suitability determinations” made for the 25 rivers deemed eligible for wild and/or scenic designation. The Plan indicates that 24 rivers, though eligible, are deemed unsuitable due solely to surrounding selected lands. Conceivably, after conveyance, some of these rivers could be determined to be suitable.	See response to comment 0392-1.
0160-3	The BLM Manual 8351 § .32(C) governing the	See response to comment 0392-1.

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	evaluation and designation of rivers under the WSRA emphasizes that all river segments identified at the outset of the planning process as eligible for potential inclusion in the NWSRS must be protected until the final suitability decision is made. BLM Manual provides that; …"protective management shall be initiated by the authorized officer … as soon as eligibility is determined." During the planning process and until a final suitability or designation decision is made, BLM should manage eligible and suitable river segments within its jurisdiction to protect their free-flowing characteristics and ORVs from any changes that would affect the rivers' eligibility or tentative classification. The Draft RMP/EIS fails to comply with these requirements. (a) It fails to set forth BLM's commitment to protecting all eligible rivers throughout the planning process. (b) it fails to include any discussion of the protection measures that will be used to safeguard the eligibility and tentative classification of all eligible rivers until a final suitability or designation decision is made. (c) there has been no 'public notification' regarding BLM's protective management.	
0160-4	ANILCA Title XI, Section 1110a provided for road construction in CSU's, but only if "such right-of way issued by BLM are subject to reasonable regulations issues by the Secretary to protect the natural and other values of such lands. BLM should provide an explanation so the public understands the potential impacts of the ANILCA provision and the potential impacts to WSR values.	At present, there are no proposals for road construction or access through either the Delta or Gulkana WSR corridors. Alternatives C and D of the Draft RMP/EIS clearly state that it is BLM's intent NOT to permit road construction, particularly through the wild segments of these rivers. However, ANILCA does allow for transportation systems across Conservation System Units, subject to reasonable regulation. In the case of a Wild and Scenic river, this would mean NEPA analysis to consider alternative routes, impacts on subsistence, impacts on the outstandingly remarkable values, and socio-economic impacts. It would also require a Section 7 (Wild and Scenic Rivers Act) evaluation to determine there would be no adverse impacts to the free-flowing nature of the river.
0160-5	Overall, the Draft RMP/EIS must be revised to ensure that, under all alternatives, motorized	The Draft RMP/EIS considers alternative management strategies for OHV management in the two designated Wild and Scenic Rivers in the planning area, the Delta and

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	activities and road and trail construction, including the use of OHVs and snow machines, are restricted to existing trails in existing, recommended, and interim-managed Wild river areas, unless BLM provides a strong explanation, rationale, or unusual circumstance justifying its departure from the normal approach.	Gulkana. This is not presented for rivers listed as eligible in the Draft RMP/EIS. See response 0392-1. BLM did not present this information in the Draft RMP/EIS because it cannot ensure protection of outstandingly remarkable values on most rivers listed as eligible in the Draft RMP/EIS in the long-term, based on the fact that the majority of these rivers run through State or State-selected lands. We can demonstrate protective management in the short term, allowing for access consistent with ANILCA (810 and 811). See response to comment 0392-1.
0160-6	Management Common to All Alternatives pg 73 (1) (a): The section on fisheries identifies that the counting tower operations would continue. I would like to point out that the BLM promised that the counting tower operations would be a temporary operation (5 years). I understand that the project was moved to private land. This would seem to indicate that this operation could no be moved to federal lands. This permanent operation would violate several provision of the WSRA. I would point out that no federal funding should be provided to this project because; it would be a permanent operation on a wild section of the river. This reference should be dropped from the draft.	The fish counting facility on the Gulkana is necessary to enhance one of the outstandingly remarkable values (fisheries) for which that river was designated in the Wild and Scenic River system. This was clearly stated in the NEPA analysis that was conducted at the outset of this project. This is NOT a permanent facility and is removed every season at the end of the season. ADF&G has indicated that another five years of data will be necessary to obtain needed data for escapement determinations. As stated in the original analysis, this will be re-evaluated in 2006. The proposal will be consistent with this RMP and with the revised Gulkana River management plan.
0163-3	We also strongly support a Wild and Scenic determination for a 15-mile section of the south branch of the West Fork of the Gulkana River to give more complete watershed protection.	Thanks for the comment. This is recommended in alternative D of the Draft RMP/EIS and the Proposed RMP/Final EIS.
0173-17	Delta WSR Corridor Area: Locatable Minerals in recreational and scenic portions of the Delta River should remain open.	Your suggestion is considered under alternative B of the Draft RMP/EIS.
0173-18	Delta WSR Corridor Area: Current withdrawals in recreational and scenic portions of the Delta River should be revoked and opened to Leasable Minerals (Oil & Gas).	Your suggestion is considered under Alternative B of the Draft RMP/EIS.
0173-19	Delta WSR Corridor Area: Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but	This is a Wild and Scenic River corridor and BLM has determined that new road construction would not enhance the values for which the river was designated. However, transportation systems through Conservation System Units are allowed by ANILCA, if no feasible alternative exists and contingent on NEPA analysis considering impacts to

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	utilize the guidelines described in the "Required Operating Procedures"	resource values. This is stated in the Draft RMP/EIS.
0173-25	Gulkana WSR Corridor Area: The BLM should revoke the existing PLO 5178 withdrawals in the Dickey Lake and south branch West Fork and open the area to Locatable Minerals.	Your suggestion is considered in alternative B of the Draft RMP/EIS.
0173-26	Gulkana WSR Corridor Area: It is totally inappropriate to include State and Native lands in the designation of the SRMA. These selected lands will in all likelihood become State or Native lands in the future. Therefore, no restrictions should be imposed on these lands that could complicate transfer or management of these lands.	State and Native selected lands are not included in the Gulkana National Wild River corridor.
0173-27	Gulkana WSR Corridor Area: Alternative D is also too restrictive. Proposals for new road construction should be considered on a case-by-case basis with no avoidance areas, but utilize the guidelines described in the "Required Operating Procedures"	Your suggestion is considered in Alternative B of the Draft RMP/EIS.
0175-24	Page 58, Delta WSR, Alternative C. The State requests that language be inserted in the Delta River SRMA Alternative C that management will be consistent with the 1983 River Management Plan for the Delta National Wild and Scenic River (Alternative C) and ANILCA 1110(a) for public access.	Consistency with Title XI of ANILCA is discussed in the Travel Management portion of Chapter 2 of the Draft RMP/EIS (page 43). Also, management direction in the 1983 Delta River Management Plan could be changed based on direction in this RMP and subsequent implementation-level planning. Language has been added in the Proposed RMP/Final EIS to emphasize and clarify compliance with Title XI of ANILCA (see page 42 and individual travel management descriptions in Chapter 2, Proposed RMP/Final EIS).
0175-25	Page 60, Delta WSR Corridor Area. Consistent with the cooperative planning effort between the Bureau and the State of Alaska for the revised Gulkana Wild and Scenic River Management Plan, we request any horsepower limitations on the Tangle Lakes be cooperatively evaluated. The State owns and manages navigable waterways, thus any restrictions would need to be adopted through appropriate state planning and regulatory processes. Under the provisions of ANILCA	These determinations will be made in implementation-level planning for the area, scheduled for 2006. As with the Gulkana, the BLM is committed to working with the State on this planning effort. Language has been added to the Proposed RMP/Final EIS to emphasize that consideration of powerboat restrictions or horsepower restrictions on navigable waterways will occur as BLM recommendations to the State.

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	Section 103(c), federal regulations adopted for the management of the Delta conservation system unit can only be applied to the federal public lands -- i.e. the land above ordinary high water within the corridor. Thus we urge that cooperative evaluation that results in further restrictions on public uses within the waterway, such as horsepower restrictions, can be more appropriately implemented following completion of a joint Bureau-State Delta Wild and Scenic River Revised Management Plan.	
0175-42	Page 284, Wild and Scenic Rivers. The State appreciates BLM's acknowledgement of Section 1326(b) of ANILCA. In this planning area the State has noted that BLM has identified a 15 mile segment of the South Branch of the West Fork of the Gulkana River, the majority of which is already designated a National Wild River, for addition to the existing CSU. While the State, in its Copper River Area Plan has also noted the exceptional recreation and fisheries values of this area and administratively designated the river as a "State Wild and Scenic River under AS 38.04.070 (4), the Legislature did not designate the Gulkana as a State Recreation River. BLM has clearly stated that designation would only be considered should that portion of the river, which currently is a high priority state selection, not be conveyed to the State (page 284). Please note that consolidated State comments submitted in 2003 regarding the Environmental Assessment for the Revision of the 1983 Gulkana River Management Plan indicated "the state would no longer consider pursuing the federal designation as a wild river" for the South Branch of the West Fork of the Gulkana.2 The State's position has not changed.	We recognize the State's position, and it is the driving factor in BLM deferring suitability determinations until State entitlements are met and land status is determined. See response to comment 0392-1.

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0185-4	The south fork of the west branch Gulkana River should NOT be conveyed to the State of Alaska. This should be retained within BLM management for recommendation and inclusion (addition) into the National Wild and Scenic River System.	Conveyance is ultimately a State of Alaska decision and out of the scope of this planning effort.
0187-3	Also, the West Branch of the Gulkana should be retained in federal ownership in order to ensure designation as a Wild and Scenic River.	This is ultimately a State of Alaska decision and out of the scope of this planning effort.
0306-2	The south fork of the west branch Gulkana River should NOT be conveyed to the State of Alaska. This should be retained within BLM management for recommendation and inclusion (addition) into the National Wild and Scenic River System.	See response to comment 0392-1. However, BLM has no authority to tell the State which lands they should or should not convey and decisions made in this RMP will not affect the conveyance process.
0312-18	The Interagency Guidelines governing river designation under the WSRA provide that, "while only one outstandingly remarkable value is necessary for eligibility, the study report should carefully document all values of the river area." The table on page 283 of the Draft RMP/EIS provides a summary of BLM's eligibility determinations. However, the few words used to describe the ORVs in the right-hand column of this table are not adequate to constitute a "careful documentation" of all the applicable ORVs for each river. A more detailed description of the specific ORVs for each river must be provided.	See response to comment 0392-1.
0312-19	We request that BLM prepare a Revised Draft RMP/EIS that sets forth adequate ORV descriptions so that the public will have an opportunity to review and comment on this information before a Proposed RMP/Final EIS is issued.	The public has had an opportunity to review and comment on the list of eligible rivers and brief description of ORVs provided on page 283 of the Draft RMP/EIS. As explained in response to comment 0392-1, this list will be modified based on that public comment.
0312-20	The BLM Manual repeatedly emphasizes that all river segments identified as eligible at the outset of the planning process must be	See response to comment 0392-1. Please note that BLM's 8351 Manual also states "In cases where a particular river segment is predominantly non-Federal in ownership and contains interspersed BLM-administered lands, BLM shall evaluate only its segment as

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	managed to protect their free-flowing characteristics and ORVs from any changes that would affect the rivers' eligibility or tentative classification. These interim protective measures must remain in place until final suitability decisions are made at the end of the RMP planning process, or until a final designation decision is made by Congress. The interim protective measures being implemented by BLM "shall be included in the RMP." and BLM is required to provide public notification of its protective management measures" no later than publish and release of the draft RMP." The Draft RMP/EIS fails to comply with these requirements in several respects. First, it fails to set forth BLM's commitment to protecting all eligible rivers throughout the planning process. Second, it fails to include any discussion of the protection measures that will be used to safeguard the eligibility and tentative classification of all eligible rivers until a final suitability or designation decision is made. Third, there has been no "public notification" regarding BLM's protective management of all eligible rivers in the Draft RMP/EIS or in any separate public notice document. We request that BLM issue a Revised Draft RMP/EIS that complies with these requirements.	to eligibility and defer to the State or to the private landowners' discretion as to their determination of eligibility." In the case of this planning effort, most rivers identified in the Draft RMP/EIS as eligible have adjacent uplands that are predominantly State or State-selected lands. BLM can demonstrate (and will in the Proposed RMP/Final EIS) protective management in the short-term but cannot demonstrate this once conveyance takes place. The State has clearly stated (in their response to scoping in this RMP process) that they will not support additional Wild and Scenic river designations.
0312-21	Considering that this segment [south branch of the west fork of the Gulkana] is selected for conveyance by the State of Alaska, we support a relinquishment of the State's selection or possibly a negotiation to convey an alternate parcel of equally desirable land in order for the south branch of the West Fork of the Gulkana River to remain in BLM ownership and receive protection under the authority of the Wild and Scenic Rivers Act. We are concerned that the	See response to comment 0392-1.

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	State's management prescription will carry minimal restrictions and be unable to guarantee consistent ORV protection as is available under the WSRA on adjacent BLM lands.	
0312-22	We are disappointed that the following rivers were not presented as "eligible" within the draft plan and we request that they are revisited and given consideration for designation into the NWSRS. We submit that the Duktoth River is suitable for inclusion in the NWSRS. This free flowing river in the Robinson Mountains east of the Bering Glacier possesses outstandingly remarkable scenery, wildlife, recreational, and cultural values. The State's Yakataga Area Plan describes the old-growth rainforest present within the river valley as well as "moose and mountain goat winter habitat, bear feeding concentration areas, outstanding habitat for Marten, swans, eagles, and anadromous fish." The 1995 DNR plan goes on to describe "the long, enclosed valley creates a visual gateway to the inland glaciers and massifs, unique within the planning area." Commercial sport fishing and hunting currently occurs on this river as it is one of the few floatable coastal rivers in the area. "The scenery and river accessibility give (the Duktoth River) potential for recreation and tourism" (DNR 1995). With a rich cultural and historical tradition as a travel route in the Eyak territory, in addition to all of its other stated outstanding values, the Duktoth is a significant system worthy of consideration and protection under the WSRA or other designation.	See response to comment 0392-1. The Duktoth is on the list of eligible rivers in the Proposed RMP/Final EIS.
0312-23	We submit that the BLM-managed portions of the Kaliakh, Klutheith and Kosakuts Rivers are also suitable, and eligible, for designation.	See response to comment 0392-1. Kaliakh is already on the list of eligible rivers presented on page 283 of the Draft RMP/EIS. This list will be edited in the Proposed RMP/Final EIS based on public comment and staff review.

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	These rivers each possess outstandingly remarkable cultural values derived from historic use by Eyak and Tlingit communities along the coast. Breathtaking scenery and abundant wildlife populations made these rivers destinations of early inhabitants and cherished treasures for local residents and visitors today.	
0312-24	The draft RMP/EIS improperly states on page 76 that "A suitability analysis was conducted, with only one river segment determined to be suitable…" This misleading statement suggests to the public that final suitability and non-suitability decisions have already been made. However, BLM Manual 8351 provides that, "all eligible river segments shall be evaluated for suitability or nonsuitability using the BLM RMP process." Moreover, the planning records and documents prepared during the RMP process "must carefully describe all analyses and determinations made pursuant to this Manual," and a "narrative and rationale must be a part of the planning record and included as part of the RMP/EIS."	The BLM will defer it's suitability determinations. See response to comment 0392-1.
0312-25	We request BLM to comply with the instructions of BLM Manual 8351, which states that "at least one alternative shall provide for designation of all eligible river segments (under assessment in the RMP/EIS in accordance with their tentative classifications." No such alternative is presented within the draft East Alaska RMP/EIS.	See response to comment 0392-1.
0312-26	Under NEPA, the Interagency Guidelines, and Appendix C of BLM's Land Use Planning Handbook, BLM must include, and fully analyze, a reasonable range of alternatives for the use of these river areas. The Draft RMP/EIS improperly takes it as a given in all four alternatives that only one river will be	Please cite the section of NEPA or BLM's Land Use Planning Handbook that requires us to analyze alternatives for river suitability. We can't find it. Please see responses to comments 0331-2 and 0392-1.

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	recommended for designation and the other twenty three will not. In order to provide a reasonable range of alternatives, BLM must consider alternatives involving the designation of all rivers, the designation of only one river, and other alternatives falling between these two extremes. For those alternatives involving the designation of fewer than all of the rivers, we urge BLM to analyze other potential means for protecting the non-designated rivers' ORVs, including land use designations such as Areas of Critical Environmental Concern, Research Natural Areas, Outstanding Natural Areas, and Special Recreation Management Areas.	
0312-27	The suitability analysis conducted on the 24 eligible rivers appears to consider land status to be the most important factor of the decision process. There are 13 suitability criteria set forth in BLM Manual 8351. For each of the eligible rivers, there is little or no discussion of (a) the reasonably foreseeable potential uses of the land and related potential uses of the land which would be enhanced or foreclosed by designation; (b) the degree to which State or local governments might participate in the preservation and administration of the river; © public support or opposition to designation under the WSRA; and (d) the estimated cost to the United States of designation and administration. Many of the other suitability criteria were also addressed inadequately. We understand that BLM may ultimately decide to make the final suitability and non-suitability determinations based on only a few of the suitability criteria. However, we request a discussion of all of the criteria and a reasoned explanation as to why BLM is weighing certain criteria more heavily than others. We also request an opportunity to review and offer	The Proposed RMP/Final EIS will state that suitability determinations will be deferred. See response to comment 0392-1.

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	comments on the suitability analysis record in which all 13 factors were considered, particularly public comment.	
0312-28	It is improper for BLM to base its proposed suitability determinations on the fact that a river is not free-flowing or that the river has no ORVs. These factors are only relevant to the eligibility determinations. By determining that the twenty-four rivers were eligible, BLM necessarily concluded that these rivers were free-flowing and possessed ORVs before ever reaching the suitability analysis. We request that BLM exclude all references to these factors in its discussion of suitability.	See response to comment 0392-1.
0312-29	On page 283 of the Draft RMP/EIS, BLM identifies twenty-four rivers as eligible, but on page 282, BLM refers to the existence of twenty-five eligible rivers. We request clarification as to whether twenty-four or twenty-five rivers are under consideration for possible addition to the National Wild and Scenic Rivers System. If one of the rivers identified as eligible in the 1989 review is now no longer considered eligible, BLM should explain its rationale for that decision in a revised draft RMP/EIS.	This is a typographical error. Twenty four is the correct number.
0312-30	It is not sufficient for BLM to propose non-suitability for rivers based on the fact that a portion of the river segment or the adjacent uplands are already owned by the State of Alaska, Native entities, or private landowners. By definition, the only eligible river segments under consideration in this RMP planning process are those that are at least partially on BLM-administered lands. If partial non-federal ownership is the basis for a non-suitability determination, BLM must provide a detailed explanation of how such ownership and	See response to comment 0392-1.

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	jurisdictional issues would interfere with management to protect the river's ORVs.	
0312-31	It is not sufficient for BLM to rely on the State-selected, Native-selected, or Dual-selected status of rivers in making its proposed non-suitability determinations without providing any discussion of how these potential ownership and jurisdictional issues would interfere with management to protect the rivers' ORVs. BLM appears to assume that designation under the WSRA in only possible if federal management of the entire river area and adjacent uplands by the BLM is certain or likely. This is not a valid basis for a non-suitability decision. The BLM Manual clearly contemplates that there will be some river segments within the NWSRS that are not federally managed or that are only partially federally managed.	BLM's manual may contemplate that there will be some river segments within the system that will be non-federal, and we know that this is the case. However, this generally occurs where the non-federal entity is supportive of the designation. In this case, the State is clearly not, as documented in their response to scoping for this process. BLM's 8351 Manual also states "In cases where a particular river segment is predominantly non-Federal in ownership and contains interspersed BLM-administered lands, BLM shall evaluate only its segment as to eligibility and defer to the State…as to their determination of eligibility." This is clearly a factor in this planning area.
0312-32	It is also inappropriate for BLM to deem Monsoon Creek/Lake, Victor Creek, Hungry Hollow Creek, and 12-Mile Creek not suitable because they do "not present outstandingly remarkable values significantly different than the existing and adjacent Gulkana National Wild River." (p. 284-285). One of the factors in the suitability analysis is a river's "contribution to a river system, watershed, or basin integrity" because it is recognized that "numerous benefits are likely to result from managing an entire river or watershed…". BLM Manual 8351 .33(A)(13), at 21. The fact that the various rivers and tributaries within the Gulkana River watershed share its ORVs strongly weighs in favor of designating these rivers under the WSRA to enhance and promote protection of the larger natural ecosystem.	See response to comment 0392-1.
0312-33	We submit that it is premature and	We agree. See response to comment 0392-1.

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	inappropriate to make final suitability decisions and recommendations within this RMP. We recommend that BLM use this RMP public process to collect information and conduct a preliminary suitability analysis, yet defer the final suitability decisions until after State and Native conveyances are completed. Only at this time will the ownership status of the eligible rivers be fully known and the corresponding management challenges, if any, best understood.	
0312-34	Additionally, we request that the BLM commit in the Proposed RMP/Final EIS to conduct a future suitability re-analysis for all eligible rivers that are retained under permanent BLM management. At that time, BLM should make the appropriate recommendations to Congress for inclusion in the national system or apply administrative measures to appropriately manage and enhance the outstandingly remarkable river-related values that have been inventoried and presented with this draft plan.	BLM will defer suitability determinations until entitlements are met and land status is more stable. See response to comment 0392-1.
0312-36	According to BLM Manual 8351, "BLM assigns a Class I visual resource inventory to all designated rivers classified as wild." Alternative B of the draft RMP violates this mandate by proposing to assign "Class II for the Delta and Gulkana Wild and Scenic River corridors…", page 79.	See response to comment 0392-1.
0312-37	In addition, Alternative A fails to specify what VRM Class is being applied, and it should be revised to clarify this issue.	Alternative A represents the No Action alternative. Currently, there are no VRM classes established for the area managed by the Glennallen Field Office.
0312-38	Finally, in all alternatives, BLM should clarify that VRM class I status will be applied, not only to the existing Delta and Gulkana river corridors, but also to (1) the proposed addition to the Gulkana wild river corridor, (2) any other rivers proposed for designation as wild rivers	We disagree. NEPA requires a range of alternatives. VRM classes other than class I are considered in order to analyze effects of No Action or a less restrictive application.

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	after a revised suitability analysis, and (3) all eligible rivers being managed in the interim in accordance with a tentative classification as wild.	
0312-39	We also urge BLM to apply VRM Class I status more broadly to all rivers designated or proposed to be designated under the WSRA, including scenic and recreational river areas. In addition, we request that BLM assign VRM Class II to the adjacent lands within the viewshed to retain the existing character of the landscape and primitive recreation opportunities.	Your suggestion for the designated rivers is considered in Alternatives C and D of the Draft RMP/EIS.
0312-40	BLM Manual 8351 provides that all "new mining claims and mineral leases are prohibited…" in wild river areas. In order to conform to this requirement, BLM must revise the Draft RMP/EIS to clarify that, under all alternatives, new mining claims and mineral leases will be prohibited in all wild river segments (including existing, proposed, and interim-managed wild rivers). The current language on pages 57, 76,80,83,86,105,107,110, and 125-128 describing the alternatives is vague and inconsistent in this regard.	Because the ANILCA designation of the Delta and Gulkana rivers included a mineral entry and leasing withdrawal in the wild segments, this was maintained under all alternatives in the Draft RMP/EIS. The Proposed RMP/Final EIS will describe protective measures for the revised eligible river list (see response to comment 0392-1).
0312-41	We support the Alternative D proposal on pages 127-128 of the draft plan to close "all segments" of the Delta and Gulkana Wild and Scenic Rivers to mineral leasing and locatable mineral entry. We also support BLM's recommendation to withdraw 16,000 acres in the scenic and recreational portions of the Delta River from locatable mineral entry. These protective withdrawals will give BLM the necessary management tools to ensure that the present high quality resource conditions and opportunities along these rivers are	Thanks for the comment.

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	preserved from mining impacts within the corridors indefinitely.	
0312-42	We request that the Proposed RMP/Final EIS identify the mineral management provisions BLM will apply to protect the ORVs associated with the south branch of the West Fork of the Gulkana River in order to preserve its suitability and consideration for designation into the National Wild and Scenic Rivers System.	This will be done in the Proposed RMP/Final EIS (see response to comment 0392-1). In short, no mineral entry or mineral leasing can occur on selected lands in order to avoid encumbrance on the selection. This area is all State-selected.
0312-43	We urge BLM to reconsider the Alternative D provision to allow mineral material sales in the recreational portion of the Delta WSR area (p. 128-129). The operations associated with mineral material extraction are very noisy and intrusive, and they would degrade the landscape, aesthetic values, fish and wildlife habitat, recreational opportunities, and other values of the river area. This conflicts with BLMs duty under the WSRA to protect and enhance the values for which the Delta River was designated.	This decision is consistent with direction in the 1983 Management Plan for the Delta and BLM Manual 8351 direction for management of a recreational segment: "Existing parallel roads can be maintained on one or both river banks." Potential mineral materials extraction would be utilized to maintain the Richardson Highway, which parallels the recreational segment of the Delta. A section 7 (WSRA) evaluation would be done prior to this activity occurring.
0312-44	BLM Manual 8351 provides that, in wild river areas, "no construction of new roads, trails, or other provisions for overland motorized travel would be permitted within the river corridor." In scenic river areas, "roads or trails may occasionally bridge the river area and short stretches of conspicuous or long stretches of inconspicuous and well-screened roads could be allowed." In various places, the Draft RMP/EIS states that new road construction may be authorized in wild and scenic river areas "if it is determined that there are no economically feasible and prudent alternative routes and a determination is made that construction would be compatible with the values for which the river was established," and it refers to this in shorthand as a road	We disagree. There are exceptions to the policy described in BLMs Manual 8351 and they are a part of ANILCA, a law by which BLM must comply with in it's management of Conservation System Units in Alaska. Please see response to comment 0160-4.

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	construction "avoidance area" (see pp. 35, 43, 76, 80, 86). This approach is improper and unlawful. BLM has already determined that new road construction is incompatible with wild river areas, and that roads are only compatible with scenic river areas if they comply with the few bridges and inconspicuousness requirements. There are no exceptions to these requirements based on open-ended compatibility determinations or the lack of an economically feasible alternative. The text of the Draft RMP/EIS should be revised to ensure that these requirements are applied consistently throughout all of the alternatives to all existing recommended, and interim-managed rivers.	
0312-45	BLM has determined that, for wild river areas, "motorized travel on land or water…is generally not compatible with this river classification. Normally, motorized use will be prohibited in a wild river area." All four of the alternatives fail to comply with this standard. In each alternative, the Gulkana and Delta river areas would be designated as "limited" to recreational OHV use, and there would be minimal or non-existent restrictions on snowmachines. This fails to comply with the general prohibition on motorized activities in wild river segments, and BLM has failed to present any explanation, rationale, or unusual circumstance justifying its departure from the normal approach.	Please recognize that the Wild and Scenic Rivers Act was amended by ANILCA. BLM must comply with ANILCA in its management of Wild and Scenic Rivers in Alaska. In some cases BLM's management direction in 8351 must be tempered to meet ANILCA requirements. OHV use is one of those cases. ANILCA (specifically sections 811 and 1110) allows for reasonable access to subsistence resources by traditionally employed means, subject to reasonable regulation. The Draft RMP/EIS, in its' consideration and analysis of management alternatives, complies with ANILCA.
0312-46	The RMP/EIS should specify that motorized activities, including the use of OHVs and snowmachines, will be limited to designated trails in existing, recommended, and interim-managed scenic and recreational river areas.	This is done in the Draft RMP/EIS under alternatives C and D for the designated WSR Rivers, the Delta and Gulkana.
0312-47	According to BLM Manual 8351, in a wild river area, "cutting of trees shall not be permitted	Consistent with ANILCA, BLM has allowed small-scale subsistence firewood gathering to occur in the Gulkana and Delta WSR corridors. This is consistent with management

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	except when needed in association with a primitive recreation experience…". In a scenic river area, "…timber harvesting could be allowed provided that such practices are carried on in such a way that there is no substantial adverse effect on the river and its immediate environment. The river area shall be maintained in its near natural condition." In a recreational river area, timber harvesting is allowed "under standard restrictions to avoid adverse effects on the river environment and its associated values." With respect to alternatives A, B, and C, the Draft RMP/EIS should be revised to clearly demonstrate to the public that the requirements set forth above will be implemented for all existing, recommended, and interim-managed river areas.	direction in the 1983 Management plans for these rivers and the RMP or the Revised Gulkana Management Plan (in Draft) does not propose to change it. This is NOT timber harvest but scattered cutting of dead trees for personal use that occurs in the winter.
0312-49	Concerning Alternative D, the Draft RMP/EIS states on page 117 that "commercial harvest would not be permitted within the Gulkana or Delta Wild and Scenic River corridors." This language should be revised to indicate that commercial timber harvest will not be allowed in recommended or interim-managed river areas, along with existing river areas.	See response to comment 0392-1.
0312-50	This section states that personal use wood gathering in the Gulkana and Delta river corridors would be "monitored closely to ensure that it does not impact the viewshed." This language is not adequate because it fails to reflect the standards listed above. Avoiding impacts to the viewshed is only one aspect of the primitive recreation experience. For instance, inappropriate firewood removal activities could harm fish and wildlife without necessarily affecting the viewshed. There has also been no showing that personal firewood gathering is "needed" to promote a primitive	See response to comment 0312-47.

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	recreation experience in wild river areas.	
0312-51	We are concerned that the Draft RMP/EIS fails to analyze the direct, indirect, and cumulative impacts of BLMs proposed management decisions, as required by NEPA. BLM must present a detailed analysis of the impacts of its proposed management decisions concerning visual resources, mining, timber harvesting, road and trail construction, and motorized vehicle use on fish, wildlife, ecosystems, recreational opportunities, historic and cultural values, local economies, communities, scientific and educational opportunities, subsistence users, and all other significant impacts.	The Draft RMP/EIS does not fail to analyze the environmental consequences of implementation of each alternative. This is done in Chapter 4 for direct, indirect and cumulative effects.
0317-1	Please consider designating the Delta and the Gulkana Rivers as "Wild and Scenic".	Thanks for the comment. You are in luck. They already are and they will stay that way.
0321-11	We ask that the BLM reconsider its decision to leave out 23 rivers from Wild and Scenic designation. Furthermore, we ask that the 15-mile section of the South Branch of the West Fork of the Gulkana River the does qualify for Wild and Scenic designation not be conveyed to the State of Alaska, but be protected as federal land.	The conveyance decision is ultimately up to the State of Alaska. See response to comment 0392-1.
0329-17	Recreation on the Gulkana river is a key issue. Upper use limits are essential. The state will drive this river into the ground, if you let them. Please take a leadership role is conservation of this incredible place.	Upper use limits have been established in a Draft revised Gulkana river management plan. They are based on standards developed from river users tolerances to different impacts on the river. The revised Gulkana river management plan will be consistent with decisions made in the RMP.
0329-20	Trustees for Alaska has submitted additional specific comments on our behalf regarding Wild & Scenic Rivers. The following are intended to supplement those comments. There is local support for Wild & Scenic River designation of all eligible rivers. It is unclear whether BLM has conducted an eligibility review as required under the W&SRA. There is	See response to comment 0392-1.

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	no review in the MSAs. The Draft EIS/RMP suggests that an eligibility review of some 300 rivers in the planning area was done in 1989, which whittled that list down to the 25 eligible rivers listed in this document. There are several problems with this. First, it is incorrect to say the list of 25 came "after interdisciplinary review." (p.282) That 1989 review was not completed because the RMP process was scrapped. It is unclear what phase of the review that team was in when their work halted, but it is certain that it was not completed. Second, there is no evidence that BLM has reviewed that list of 300 since 1989. Recycling incomplete and old documents is not the careful study or thorough analysis required by the W&SRA, FLPMA and NEPA. Third, using this ancient review precludes meaningful public involvement. The original (1989) review didn't follow a full public process, and the current review is already 90% along.	
0329-21	What rationale or method did you use to determine which rivers were suitable? The DEIS contains only a table, and the MSA ignores the issue entirely. It is a mystery how this issue was dealt with. ... The Draft EIS/RMP only includes a few words and conclusory sentence fragments. (pp.283-5) It is impossible to know the basis behind these "unsuitable" and "eligible" conclusions. Please fully document the values of eligible rivers in a Revised Draft EIS/RMP, and use that careful study to inform suitability determinations. We would very much like to have an opportunity to review and comment on your suitability determination. ... We are concerned that BLM is precluding meaningful public input into the suitability study, by completing it behind closed doors and outside of the RMP process, and	See response to comment 392-1.

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	NEPA.	
0329-22	BLM must manage all eligible river segments to protect their values from degradation in the interim between eligibility and a final action. This information should be in the Draft RMP/EIS, and be revealed to the public. BLM Manual 8351§.32(C)	See response to comment 0312-20.
0329-23	What were the ORVs for Sourdough Creek and Haggard Creek, that caused them to be eligible in the first place? What has changed, to negate those values? We take issue with the "significantly different" standard for ORVs, which is used as the basis for unsuitability of Monsoon Creek/Lake, Victor Creek, Hungry Hollow Creek, and 12-Mile Creek. (p. 284-5) On page 283, being connected to the Gulkana is an ORV. But on pages 284-5, this same feature is used to determine that these sections are unsuitable. Please adopt a consistent approach. Using the standard in the Draft EIS/RMP, any given segment of any given Wild & Scenic River would become unsuitable.	See response to comment 0392-1.
0329-24	We strongly encourage you to look at intact watersheds, rather than isolated segments. If anything, the existence of other nearby rivers with similar ORVs weighs in favor of designation, not against it. One of the factors in the suitability analysis is a river's "contribution to a river system, watershed, or basin integrity" because it is recognized that "[n]umerous benefits are likely to result from managing an entire river or watershed … ." BLM Manual 8351 § .33(A)(13), at 21	Suitability determination will be deferred until land status is stabilized. See response to comment 0392-1.
0329-25	Wild & Scenic river designation would include protections of water and water quality, recreation, scenery, wildlife, fish, and other values. These benefits are ignored in the Draft EIS. (p.419) It is very unclear in this document	The value of designations in terms of protection of resource values will be examined in the suitability determination, which will be deferred until land status is resolved through the conveyance process. At this time, we can not demonstrate that BLM could protect these values in the long term on most rivers listed as eligible in the Draft RMP/EIS. Please see response to comment 0392-1.

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	what designation would mean, in practical terms. We insist that you follow NEPAs mandate to reveal and consider environmental impacts of these designations.	
0329-26	We support recommending the following rivers for Wild & Scenic River designation: Copper River. If the Copper River is not eligible as wild and scenic, then what is? That this river isn't even considered eligible by BLM, indicates a deep lack of understanding somewhere along the line. To conclude that the Copper River does not have any outstandingly remarkable values is ridiculous. The Copper is one of the world's great rivers. Outstandingly remarkable values include millions of Wild Copper River Salmon, outrageous scenic quality, premier recreation opportunities, history of the old CR&NW Railroad, and Eyak and Ahtna historical and cultural values. Please analyze the relative merits of W&SR and ACEC designation, in protecting these incredible values. Gulkana River and wetlands. Whether or not the land is conveyed, the South branch of the West fork of the Gulkana is suitable as a W&SR. Further, the various tributaries found eligible in 1989, and listed in the Draft EIS/RMP are also suitable. Duktoth. The Duktoth is a pristine, free flowing river that has several outstandingly remarkable values. If there is a wilder or more scenic river in the world, then we'd like to know what it is. We have brought these values to your attention more than once, but have been ignored. Why? Please consider the Duktoth under the W&SRA. ... Kaliakh River- The Kaliakh River and tributaries have outstandingly remarkable scenic and wildland values, and are a historic center of Eyak and Tlingit habitation along the coast. ...Tiekel River; Susitna River; Tonsina	See response to comment 0392-1. The list of eligible rivers presented in the Draft RMP/EIS will be edited based on public comment and BLM staff review and presented in the Proposed RMP/Final EIS.

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	River; Nenana River; Tangle Lakes trail system.	
0329-43	The increased use on the Gulkana and Delta rivers is alarming, (p.173) especially given the lack of a comprehensive management scheme. Please take action before it's too late.	The Draft RMP/EIS establishes broad management direction for the Delta. The implementation level plan for this area is scheduled for 2006.
0331-2	A full range of alternatives is not offered. The RMP/EIS is deficient in that it does not provide an alternative that would recommend Wild and Scenic River status for all eligible rivers. We feel that our opportunities for learning about and commenting on this issue have been denied.	A range of alternatives displaying different suitability determinations is meaningless in this planning area, where the majority of rivers listed as eligible in the Draft RMP/EIS run through State or State-selected lands. Saying that we will make all these rivers suitable is playing a make-believe game when we cannot demonstrate long-term protection of outstandingly remarkable values and where there is clear documentation of State opposition. Response to comment 0392-1 states that suitability determination will be deferred until entitlements are met and land status is more stable. A consideration of suitability alternatives at that time would be more meaningful.
0334-1	I would like to see the Tangle Lakes remain a wild and scenic area, especially free of any strip mining. The Delta River should remain a wild and scenic river. This lake-river system has been used by all kinds of Alaskans for years as a recreational haven. Please retain the pristine quality of this special piece of land.	These areas both will remain as ANILCA designated them: A part of the national Wild and Scenic River system. Management objectives described in the preferred alternative (D) of the Draft RMP/EIS are consistent with this designation and will continue to protect and enhance the values for which the river was established.
0341-12	We support designating this branch of the Gulkana River and encourage BLM to reconsider their preliminary suitability decisions for the other 23 eligible rivers that possess Outstandingly Remarkable Values.	See response to comment 0392-1.
0355-28	On page 76 reference to WSR areas becoming State land and retaining WSR designation makes no sense. Navigable rivers are owned by the State of Alaska and the BLM manages only the uplands adjacent to such waters. Also, under (4) it states that the BLM "would" recommend inclusion. This is not consistent with the instructions given by the Secretary of the Interior found on page 15.	The Secretary's instructions referred to on page 15 are regarding wilderness designation and inventory in land use planning, not Wild and Scenic River suitability or designation.
0392-1	It is our hope that some sort of negotiation or arrangement can be made in order to convince the State to relinquish their selection on these	The section of the Draft RMP/EIS entitled "Eligibility and Suitability Review" (page 282) has been re-written in the Proposed RMP/Final EIS (pp. 312–314), which now includes: 1) a list of eligible rivers, determined through this planning process and edited from the

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	lands [South branch of the West Fork of the Gulkana River] so that they can be maintained in long-term Federal management and nominated to Congress for inclusion with and protection under the Wild and Scenic River Act.	list presented in the Draft based on public comment; 2) A description of how BLM will defer suitability determination until ANCSA and State entitlements are met in the planning area. This is based on the fact that the BLM's primary criteria for suitability determination in the Draft RMP/EIS was land status and we cannot demonstrate in the long term that we can manage to protect identified outstandingly remarkable values when uplands are State or ANCSA selected; 3) an Appendix J providing a brief narrative of how BLM will provide interim (or long term) management to protect identified outstandingly remarkable values on eligible rivers and giving a more detailed description of the outstandingly remarkable values on the eligible rivers.
ROPS AND STIPS		
0044-26	The ROP system and NSO option (p. 517) seems good. But after seeing the Alaska system in action, I suggest that NO exceptions or waivers be allowed to weaken the ROPs.	Exceptions, modifications, and waivers are identified consistent with BLM guidance (Oil and gas handbook, H-1624-1). They are identified to allow flexibility, based on site-specific analysis during a NEPA process.
0175-57	Exceptions, Modifications, and Waivers, page 608 (paragraph 2). The introductory section addressing exceptions, modifications, and waivers, states that the first requirement is that "the circumstances or relative resource values in the area had changed following issuance of the lease." The State is concerned that a lease stipulation may be attached to a lease but the stipulation may not be appropriate for the entire lease area. An exception may be warranted because the specific area of activity does not justify the stipulation. As currently written, however, an exception could not be granted without demonstrating that something has changed. The exceptions themselves, included with each stipulation, are written in such a way that this first requirement is inconsistent. For example, Stipulation 2 allows exceptions, if a specific area is not actually used by moose, which has nothing to do with changed circumstances. Therefore, the State recommends that the first requirement for granting an exception be deleted, or established as a separate independent	BLM feels that the wording on page 608 is not contradictory to the actual exception, modification and waiver language in the stipulations. Page 608 is defining what conditions would need to occur, in site-specific NEPA analysis, for the exceptions, modifications, or waivers to change. This ensures that stipulations are realistic based on on-site conditions.

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	justification for granting an exception.	
0175-58	ROP, Riparian Areas and Water Quality ROP-Water-c-2. Refueling of equipment within 500 feet of the active floodplain of any fish-bearing waterbody and 100 feet from non-fish bearing water bodies is prohibited. The AO may allow storage and operations at areas closer than the stated distance if properly designed to account for local hydrologic conditions. The AO should have the ability to approve exceptions to the above ROP where it would not be practicable for equipment or pumps associated with placer mining operations to comply.	Language has been added in the Proposed RMP/Final EIS authorizing modification by the AO for placer mining (ROP-Water-c-2, page C-13).
0175-59	Standard Lease Terms: Section 7, Mining operations. To the extent that impacts from mining operations would be substantially different or greater than those associated with normal drilling operations, lessor reserves the right to deny approval of such operations. The above ROP appears to be an example of a previous ROP originally associated with oil and gas development. The State suggests that it is reasonable to assume that the impacts from a mining operation would be substantially different and greater than those associated with mineral exploration drilling. The impacts from a proposed mining operation should be evaluated and minimized through the Plan of Operations Approval process, but they will likely be greater than those associated with the drilling of an exploration drill hole. It is not reasonable to expect mining companies to invest capital in mineral exploration if they cannot expect to develop the mineral resources. The State suggests that this section be deleted.	The comment refers to Section 7 of the Standard Lease Terms. This is not a Required Operating Procedure, but is part of the Standard Lease Terms. Section 7 refers to mining activities associated with oil and gas development of the lease.
0312-109	ROP-F&W-a-1 (p. 612): The requirement to “utilize existing roads and trails whenever	The language "Use of existing roads and trails shall require a site-specific exception from the Authorizing Officer" has been added to this ROP in the Proposed RMP/Final EIS.

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	possible" does not clarify what situation creates an impossibility such that it is permissible to travel over pristine fish and wildlife habitat. This ROP should require a site-specific exception from the Authorizing Officer before allowing off-road or off-trail travel by motorized vehicles.	
0312-110	ROP-F&W-a-6 (p. 612): The setback requirement of 500 feet for roads, well pads, and other oil and gas facilities from fish-bearing waterbodies is insufficient. The setback should apply to all waterbodies, and should be from the "Riparian Reserve" area as defined by the Environmental Protection Agency for all BLM land. A "conservative riparian reserve width" for fish bearing streams is "the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), whichever is greatest."9 This definition leads to a minimum setback requirement of 800 feet from fish-bearing waterbodies, with the possibility that the setback would be greater depending on the characteristics of the waterbody.	EPA thoroughly reviewed the Draft RMP/EIS, and provided some comments specifically on ROPs. However they did not question the adequacy of the 500-foot buffer from fish bearing streams nor did they refer to the Riparian Reserve standards that you cite.
0312-111	ROP-F&W-a-7 (p. 612): What constitutes the location a fish-bearing stream should be determined by the definition of a conservative riparian reserve width (above), rather than the "active floodplain." Additionally, exploratory oil and gas drilling should be prohibited in fish-bearing rivers and streams and fish bearing lakes with no chance to demonstrate that impacts would be minimal or that there is no feasible or prudent alternative.	ROP-F&W-a-7 has been deleted in the Proposed RMP/Final EIS. ROP-F&W-a-6 prohibits oil and gas facilities or roads within 500 feet of fish bearing rivers, streams, or lakes. It does allow for exploratory drilling under frozen conditions, utilizing ice roads.

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0312-112	ROP-F&W-a-12 (p. 613): Other than illegal shooting and natural predation, the U.S. Fish and Wildlife Service lists collisions with powerlines as the major source of trumpeter swan fatalities. As such, overhead powerline construction should be prohibited rather than merely avoided in primary trumpeter swan breeding habitat.	There may be cases where we cannot legally prohibit overhead powerlines, if no feasible alternative exists. Thus the avoidance wording.
0312-113	ROP-F&W-a-13 (p. 613): Recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites or staging areas should only be allowed if the lessee or permittee can demonstrate on a site-specific basis that impacts will be minimal or it is determined that there is no feasible or prudent alternative. “Swans will not nest on lakes intensively developed for recreation. For example, trumpeter swans have stopped nesting on Wembly Lake and Crystal Lake in the Grande Prairie area. Management programs to control the amount and/or type of recreational activity could reduce this problem.” Swans are particularly sensitive to human disturbances.	Thanks for the comment. This is an editing error and will be changed in the Proposed RMP/Final EIS (Appendix C) to "Recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites or staging areas will only be allowed if the lessee or permittee can demonstrate on a site-specific basis that impacts will be minimal or it is determined that there is no feasible or prudent alternative."
0312-114	ROP-F&W-b-1 (p. 613): The use restriction within a quarter mile of lakes, ponds, or marshes with trumpeter swan nests should be increased and should begin April 1 rather than May 1. Breeding is disrupted by activity within distances of between a third of a mile and a mile and a quarter from trumpeter swan nests.13 “Human activity and disturbance in the breeding areas may cause the death of adult birds and/or decreased survival of eggs or cygnets. Trumpeter swans are sensitive to repeated disturbance and may refuse to nest or abandon an existing nest in such situations. The birds are most sensitive from mid-April to	The buffer distances and seasons identified in this ROP are consistent with State (DNR) standards identified in the Copper Basin Area Plan. Because of the density of trumpeter swan nests in some portions of the planning area, this ROP applies over a large portion of BLM-managed lands (See Primary Trumpeter Swan Breeding Habitat, p. 93 Draft RMP/EIS). This ROP allows BLM the discretion to consider activities of less than 14 days, based on site-specific NEPA analysis.

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	mid-June. Unfortunately, this also is when the eggs and cygnets are at greatest risk." The ROP as currently written allows for disturbance within any distance of trumpeter swan nests if such disturbance lasts for less than 14 days. There is no evidence to show that trumpeter swans can tolerate even short term disturbances. As such, all ground disturbance or surface use should be prohibited within a mile and a quarter of lakes, ponds, or marshes with trumpeter swan nests from April 1 to August 31.	
0312-115	ROP-F&W-b-2 (p. 614): Allowing FLPMA leases or permits within calving areas, even if the leases are less than 14 days, is not sufficient to protect the calving. Calving occurs in a very short window, and this ROP allows 13 days of FLPMA permit or leases within the calving area which could significantly disturb calving.	This ROP allows us the discretion to consider what the impacts of such an activity would be in a site-specific NEPA analysis. Some permitted activities (such as an outfitter camp during spring bear hunting season under an SRP permit) would have minimal impacts.
0312-116	ROP-F&W-b-4 (p. 614): No evidence is provided that a quarter mile buffer around bald eagle nests will be sufficient to prevent disturbance. According to the Alaska Department of Fish and Game, "minimizing human disturbance near nest sites is necessary in order to protect Alaska's Bald Eagles from the potential harm caused by increasing human development." This ROP also provides for an "exemption" for mining operation. An "exemption" is not defined. There is no ROP for other raptor nests, with this ROP merely stating that "appropriate buffers around other raptor nests will be determined on site-specific analysis." The ROP-F&W-b-4 should be increased to at least a ½ mile buffer around all raptor nesting sites, with the possibility for site-specific increases depending on	At a minimum, the Bald Eagle Protection Act provides for a buffer zone of 330 feet around an active bald eagle nest. However, USFWS recommends a minimal buffer zone of at least 660 feet based on topography and vegetative screening from disturbance to the nest site. The ROP as proposed is 1/4 mile or 1,332 feet, twice the USFWS minimum recommendation. And, the wording is that an exemption "may be provided for mining operations where no feasible alternative exists and where mitigation measures can be identified to minimize impacts." Determinations for buffer zones around other raptor nests will be made on a site-specific basis during the NEPA process and dependent on species type, occupancy of the nest, and the nature of the activity proposed.

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	circumstances.	
0312-117	ROP-F&W-b-5 (p. 615): This ROP repeats the previous one and should be deleted.	You are correct. Thank you. It will be deleted in the Proposed RMP/Final EIS.
0312-118	ROP-F&W-b-6 (p. 615): Limiting helicopter landings for skiing only and not for other activities is arbitrary. Similarly, allowing helicopters to get too close to sheep and goats that happen to be outside of their critical habitat will potentially disturb large numbers of animals. Helicopters should be required to maintain a minimum distance from Dall sheep and mountain goats regardless of what range they are in, and no heli-landings should be permitted in Dall sheep or goat critical ranges regardless of the activity.	This ROP will be changed in the Proposed RMP/Final EIS (Appendix C) to include all helicopter landings, unless for emergency purposes.
0312-119	ROP-Water-a-1 (p. 616): Please see the comments for ROP-F&W-a-6 as to why a 500 foot setback from fish-bearing waterbodies and a 100 foot setback for non-fish-bearing waterbodies is insufficient.	See response to comments 0312-123.
0312-120	ROP-Water-b-1 (p. 616): Diverting streams around mining operations will cause severe degradation to riparian areas. Mining activities should be avoided in sensitive riparian wildlife and fish habitat. This includes riparian areas that are important to migratory Trumpeter swan, Mentasta and Nelchina caribou calving areas and salmon spawning.	Closures against these activities in many areas are considered in Alternative C of the Draft RMP/EIS and in some specific areas for resource protection in Alternative D.
0312-121	ROP-Water-b-4 (p. 617): The requirement that all roads etc. will be sited in upland areas if possible needs to be clarified to address what creates such an impossibility, such as siteing a road in a riparian area. This ROP should require an exception from the Authorizing Officer before allowing a road, bunkhouse, office, equipment storage or maintenance facility to be sited in a riparian area.	We feel that other ROPs (such as ROP-Water-c-2) preclude the construction of these facilities within the riparian area.

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0312-122	ROP-Water-b-7 (p. 617): Riparian vegetation should be re-established using native species, and the area should be managed for noxious weed infestations.	We agree, wherever possible, as stated in ROP-Soils-a-10.
0312-123	ROP-Water-c-2 (p. 617): Please see the comments for ROP-F&W-a-6 as to why a 500 foot setback from fish-bearing waterbodies and a 100 foot setback for non-fish-bearing waterbodies is insufficient.	This ROP will be deleted in the Proposed RMP/Final EIS and "exploratory oil and gas drilling" will be added to ROP-F&W-a-6.
0312-124	ROP-Wetlands-a-2 (p. 619): “Wetlands are considered valuable because they clean the water, recharge water supplies, reduce flood risks, and provide fish and wildlife habitat. In addition, wetlands provide recreational opportunities, aesthetic benefits, sites for research and education, and commercial fishery benefits.”16 Despite the recognized importance of wetlands, according to a 2001 BLM report describing the status of lands in central Alaska, “Where [ATV] trails traverse permafrost and wetland terrain, glistening dark scars contrast starkly with the natural green and rust colors of the tundra. Trails crossing wetlands are often in excess of thirty feet wide. Heavy rutting is common.” Road or trail construction in wetlands should be prohibited, not merely avoided.	Avoidance means they will not be permitted unless no feasible alternative exists. Alternatives would include winter (ice) roads or location of roads on upland sites.
0312-125	Stip-1: A quarter-mile buffer around trumpeter breeding areas is insufficient. Studies have shown that trumpeter swans are sensitive to human disturbances within ranges of up to one and a quarter miles.18 Additionally, there is no requirement as to what time period a nest must be abandoned before the AO may grant an exception based on non-occupancy of nests. There should be no exceptions granted for oil and gas development within a mile and a quarter of trumpeter swan breeding areas.	There is also ample evidence in this area that trumpeter swans nest and rear their young successfully within close proximity of busy highways, such as the Glenn or Richardson. However, we do not accept this as the norm and instead opt for standards that are consistent with State (DNR) standards identified for protection of trumpeter swans in the Copper Basin Area Plan. See response to comment 0312-114. Evidence of nest occupancy will be based on trumpeter swan census date (USFWS) taken every five years.

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0312-126	Stip-2: There needs to be clarification as to what constitutes “actual moose use of site-specific areas” and what type of “review and monitoring” of those areas is required before an exception can be granted. The AO should be required to perform systematic monitoring for a period of three years before an exception can be granted for an area based on non-occupancy.	This will be determined in site-specific analysis in the appropriate NEPA document. "Documented non-occupancy" would be determined by examining the specific site and looking at evidence of winter use (moose pellet density, browse intensity, or presence of moose).
0312-127	Stip-3: Disturbance near bald eagle nests should be prohibited within a half mile of nests sites, particularly if there is a direct line of sight between the nest and the activity. There should not be an exception for nests that have been unoccupied for three consecutive years. “Bald Eagles frequently re-use nest structures . . . often for a period of many years.”	Please see response to comment 0312-116.
0312-128	Should deposits of coal bed methane exist in the planning area, the BLM should seek extensive public input and develop stringent mitigation guidelines before allowing development of the resource.	We agree.
0323-12	While many of the ROPs and stipulations included in the Draft EIS should provide adequate environmental protections, there are others that may not be as timely or effective as expected due to vague wording, insufficient or ill-defined decision criteria and exception clauses. It is especially difficult to predict the effectiveness of mitigation measures that rely on decision criteria that include “whenever possible”, “where possible”, “minimize”, and “if feasible” phrases. EPA is concerned that the use, monitoring and enforcement of many of the ROPs and stipulations as they are currently written will not achieve the desired environmental outcomes or mitigation.	BLM feels they will, based on meeting the objectives stated at the outset of each section of ROPs. Flexibility is built into individual ROPs to allow for the best application, based on site specific analysis for each implementation level activity in the appropriate NEPA document.
0323-13	Agency Coordination and Consultation. The	Consultation with USFWS is required under Section 7 of the Endangered Species Act

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	Final EIS should describe how and when resource and regulatory agencies with resource management authorities would be consulted in a timely manner when the ROPs and stipulations are used in decisions that affect those resources. For example, consultation with U.S. Fish and Wildlife Service should occur prior to determining bald eagle nest buffers as described in ROP-F&W-b-4 and that requirement should be included in the ROP. Consultation with potentially affected tribes should also be conducted prior to future decisions that my impact their subsistence or cultural resources. If this consultation has been designed as part of the Memoranda of Understanding (MOUs) that are described in Chapter V of the Draft EIS, additional detail to explain that process would be helpful.	prior to initiation of any project by the BLM that may affect Federally listed or endangered species or its habitat (Draft RMP/EIS, p. 562). The bald eagle is not listed as threatened or endangered in Alaska. As discussed in response to 0312-116, BLM utilized information from USFWS to determine bald eagle nest buffer distances. BLM is committed to consultation with potentially affected tribes (as described on page 563 of the Draft RMP/EIS) and is in the process of developing MOUs with several potentially affected tribes and Ahtna, Inc. to facilitate implementation-level consultation.
0323-14	EPA recommends that where specific numerical criteria are presented, such as set-back distances, buffer zone areas and aircraft altitudes, additional detail be provided to explain how those criteria were developed, in order to predict their effectiveness. For example, justification for choosing the 500-foot buffer distance for fish-bearing rivers and lakes in ROP-F&W-a-6, ROP-Water-a-1 and other ROPs should be included.	Most buffer distances have been explained in responses to these comments (see response 0312-116 for eagles, 0312-114 for trumpeter swans). A 500 foot buffer from fish-bearing streams, rivers or lakes was considered by resource specialists to be sufficient, when combined with other ROPs and stipulations, to minimize impacts to riparian areas, water quality, and fish and wildlife. This determination was made based on knowledge of local soils and vegetation.
0323-15	EPA recommends that a description of effective monitoring and enforcement of ROPs and lease stipulations be added to Appendix III in the Final EIS, or appropriate references to monitoring and enforcement details that are contained in the main text of the EIS should be inserted.	Thanks for the comment. There will be a section added to Appendix C of the Proposed RMP/Final EIS describing monitoring and enforcement of ROPs and stipulations (pp. C-3, C-4).
0329-118	Oil & gas mitigation measures proposed are terrible. There doesn't appear to be any enforcement mechanism, or any rhyme or	We disagree. Enforcement of ROPs or stipulations is carried out by the Authorized Officer, a field office representative who deals on the ground with the permittee. Compliance inspections are conducted as part of any permitted activity. Non-compliance

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	reason to how they were developed. The Draft EIS relies on ROPs and stipulations blindly, and almost exclusively, to deal with negative impacts from oil & gas, and mining. (for example p.444-5, p.469)	results in a notice of non-compliance to the permittee, with a time-frame to correct the problem and follow-up inspections.
0329-132	We are concerned that mitigation is non-binding, uncertain and weak. Yet, these measures are a huge portion of BLM's apparent conservation strategy. On the strength of these mitigation measures, we are expected to endorse mining and oil drilling in some of the world's most valuable, and most sensitive, wildlands.	You can endorse whatever you choose. That is why you have the opportunity to comment. We feel the proposed ROPs and stipulations offer a vast improvement over the status quo in protection of specific resource concerns.
0329-133	The Draft EIS repeatedly says that proposed mitigation measures would be more effective than current stipulations. (p.402) We seriously question this finding. Why would they be any better than the current, case-by-case approach? What are you basing this critical conclusion on?	Current stipulations are general. For example "All operations shall be conducted with due regard for good resource management and in such a manner as not to block any stream, or drainage system, or cause the pollution or situation of any stream or lake." The proposed ROPs are designed for specific resource protection, based on objectives developed from the Alaska Land Health Standards. Current stipulations do not include any oil and gas, mining, or species-specific measures.
0329-134	It is also puzzling how "current industry practice" can be expected to be an improvement over itself?? If these things are standard anyway, then what particular benefit do you expect? How were these measures arrived at? Were they run by resource specialists? Industry?	We use knowledge of current industry practices to try and insure that ROPs and stipulations are practical. Development of a ROP is of no use if it can't be applied. ROPs and stipulations were developed by Field Office personnel, then reviewed by State Office specialists. They are subject to industry review through the normal public comment process.
0329-135	The Draft EIS/RMP says "ROPs would apply to all permitted activities…," and in the next breath that "not all ROPs would apply to all permitted activities." (p.607) Which is it? Do they apply or not? If not, who determines what applies in each case? What are the impacts of those determinations? What opportunity would there be for meaningful public involvement?	Not all ROPs would apply to every permitted activity. For example, ROPs describing buffers from riparian areas or protection of water quality would be a waste of paper and time on a permit for a FAA transmitter on a hill-top. Site-specific ROPs (which ROPS would be used for which projects) would be determined through interdisciplinary review during the NEPA process. NEPA actions are also subject to public review.
0329-136	We are very concerned that stipulations "could be excepted, modified, or waived by the AO." (p.608). These stipulations are a waste of	We disagree. Exceptions, modifications, or waivers are only permitted when there are site-specific conditions that would allow for a particular activity to take place without resource degradation. Note that some stipulations (pp. 627 - 629) have no exceptions,

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	paper, if the AO is going to determine them case-by-case anyway.	modifications, or waivers. Exceptions, modifications, or waivers provide flexibility when dealing with natural resources.
0329-137	Why are there no alternative mitigation measures presented? Would it be reasonable to make these measures more, or less, strict? What about adding some enforcement? Please present a reasonable range of alternatives in the Revised Draft EIS/RMP.	Alternatives were not developed around ROPs and Stipulations because we needed one set that could be applied to actions and allowable uses identified in each alternative and used to evaluate environmental consequences in Chapter 4 of the Draft RMP/EIS. A "weaker" set of ROPs and stipulations applied to a greater degree of resource development (such as proposed in Alternative B) would eliminate B as a reasonable alternative, because resource impacts would be unacceptable.
0329-138	These mitigation measures aren't enforceable. There are no penalties or consequences for violating them. This list is essentially a set of recommendations.	There are penalties, if ROPs are adopted as part of a specific permit or lease. These are conditions of the lease or permit. Non-compliance with conditions of the permit can result in permit cancellation. Compliance occurs through inspection by field office personnel.
0329-139	How are "operational requirements" enforced?	"Operational requirements" in this context refers to the Required Operating Procedures. These are conditions of the lease or permit. Non-compliance with conditions of the permit can result in permit cancellation. Compliance occurs through inspection by field office personnel.
0329-140	Lease stipulations for oil & gas leases wouldn't be applied until there were a lease being issued. At that point, what impact does Appendix III have on the stips? We are concerned that you are ignoring impacts today by relying on very uncertain future contract provisions. There is no guarantee—not even close—that these stipulations will be applied.	Required Operating Procedures apply even in areas open to leasing subject to the standard lease terms. Appropriate ROPs and stipulations are applied during the NEPA process after a lease sale has occurred and when Applications for Permit to Drill (APDs) are received.
0329-141	It is our overwhelming experience that when they conflict, industry economic needs ALWAYS trump ecological impacts. The theoretical ¼-mile bird nest buffer that prevents an oil reservoir from being fully developed is not a fair characterization of reality. If this situation occurred (and it does), BLM would certainly issue an exemption. In fact, on the next page, the Draft EIS/RMP discloses that standard lease terms "may not require the lessee to relocate drilling rigs or supporting facilities by more than 200 meters…" (p.608)	The reference on page 608 applies to areas that would be open to mineral leasing, subject to the standard lease terms (Draft EIS/RMP pp. 130 - 134). Where more resource-specific stipulations were required, the lands would be open subject to minor or seasonal constraints (see table pp. 130 - 134). And, where stipulations apply, exceptions are clearly defined. For example, in the case of eagle nests, "nests unoccupied for three consecutive years may be considered for exception."
0329-142	The Draft EIS/RMP suggests that the AO "may add additional more-restrictive stipulations as	No. However, exceptions may be granted based on site-specific information, as stated in many of the ROPs.

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	determined necessary through further NEPA analysis…" (p. 608) Is it true that they could also just as easily (and, more likely) adopt less restrictive stipulations?	
0329-143	What "environmental analysis document" would there be for oil & gas development? (p.608) What is the basis for the three-pronged requirements in those documents to exempt, modify or waive stipulations?	At least an Environmental Assessment would be done for oil and gas development. Developing exceptions, modifications, and waivers for stipulations is based on BLM guidance (Oil and gas handbook, H-1624-1).
0329-144	What is an "unacceptable impact?" (p.608)	In this context, an "unacceptable impact" would be one which a ROP or stipulation is designed to prevent.
0329-145	What is a "substantial unanticipated environmental effect?" (p.608)	Effects not anticipated during analysis of the activity.
0329-146	Changes in "relative resource values" (p.608) is an awfully sketchy loophole to offer oil companies. Given that they are the only ones to judge the value of their holdings (info. is proprietary), we don't see how an oil company could ever fail to meet this requirement. Also, are we correct in understanding that this means mitigation measures will become less restrictive as the price of oil goes up? Increased industry profitability is an illogical reason to relax environmental safeguards.	"Resource values" as used in this sentence means the resources that the ROPs or stipulations are designed to protect, not the monetary value of the resource (oil and gas).
0329-147	ROP-Soils-a are all standard practice for any logical person. That ditches are on the uphill side of the road, for example, is self-evident.	Thanks for the comment.
0329-148	ROP-Soils-a-12 is a Jedi mind trick. Just saying, "prevent and control noxious weed infestations," doesn't do anybody any good. It is misleading to say that's the case.	I haven't seen the latest Star Wars, so don't know what a Jedi mind trick is. However, this ROP does do what it is intended to do if it is made a part of a permit or lease. If compliance inspections show introduction of noxious weeds as a result of permitted activities, the permittee or lessee will need to correct the situation. If not, this could be used as grounds for permit cancellation.
0329-149	ROP-Soils-b It would be good to require winter-only operations, not just suggest it. Please also require adequate snow cover and freezeup, to account for "weird weather," and global warming.	It is not practical to require that every permitted activity that requires overland movement be stipulated to occur in the winter.

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0329-150	ROP-Soils-b-1 just suggests that permittees "work with the AO" to minimize disturbance. What does this mean?	This means that there is a tremendous amount of variability in soil stability based on slope, soil type, vegetation, permafrost, and aspect. Therefore, it is hard to generalize with a Required Operating Procedure that covers all situations for overland moves. So, site specific work between the BLM (Field Office representative working on the ground) and permittee will occur to determine the best route or vehicle type or vehicle prohibition.
0329-151	ROP-Soils-b-2 is obviously a good idea, but won't do any good when operators want to bulldoze vegetation.	This ROP obviously is not applicable where removal of the vegetation and topsoil is required, such as in mining. In this case, other ROPs are applicable to provide for reclamation of the site (ROP-water-d-8).
0329-152	ROP-Soils-b-3 is redundant, as trail limitations apply to permittees as well as everyone else. Making a law that says to follow the law, begs the question.	It doesn't hurt to remind a permittee by putting this in as a condition of the permit.
0329-154	ROP-F&W-a-2 What is "crucial spawning habitat?" We have very little faith this will be actually applied.	Crucial spawning habitat has been identified by ADF&G for some rivers and streams, consistent with AS 41.14.870. This has been applied already on the Gulkana River, where BLM has worked with ADF&G and ADNR in identifying suitable trail crossings to avoid crucial spawning habitat.
0329-155	ROP-F&W-a-6 How was 500-feet arrived at? We doubt whether this will be enough to prevent impacts to fish. Is it enough to avoid dewatering, disturbance and subsidence impacts? What does "minimal" mean?	See response to comment 0323-14.
0329-156	ROP-F&W-a-7 It is amazing that you would allow drilling IN fish streams. Please put a period after "lakes" in this paragraph, and drop the loophole.	See response to comment 0312-111. Exploratory drilling would not be allowed IN fish streams, even under frozen conditions.
0329-157	ROP-F&W-a-10 We are disappointed this mitigation measure is so weakly worded. Please use a 500-foot minimum buffer around all fish streams, and tributaries to them. Just saying, "it depends" doesn't do much good. Please also require winter operations. We don't see any particular benefit to the BLM encouraging them.	The objective here is clearly set: prevent disturbance of fish habitat and possible sedimentation into streams. The ROP gives BLM the discretion to determine the appropriate buffer to meet the objective, based on site-specific analysis. Winter logging may not be possible to accomplish some vegetation treatment objectives (such as scarification of soils for the most vigorous re-sprouting to enhance wildlife habitat).
0329-158	ROP-F&W-a-12 What does "avoided" mean? That's not a very tough requirement. What is "primary" trumpeter swan breeding habitat?	Avoid means that the activity will not be permitted unless no feasible alternative exists. Primary trumpeter swan habitat areas were identified based on the clustering of three or more documented swan nests within close proximity and allowing for a 1/4 mile buffer around the cluster.

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0329-159	ROP-F&W-a-13 Please insert the word "not" before "allowed." How are "historically active" nest sites determined? Please apply this same standard to all commercial activities, not just recreation. We recommend you adopt the standard used in the Tongass forest plan, which requires a verified empty nest for two consecutive years, before allowing activities near a known nest site.	Historically active nest sites are determined utilizing USFWS trumpeter swan census, conducted every five years. And, the wording on the ROP has been changed in the Proposed RMP/Final EIS as indicated in the response to comment 0312-113.
0329-160	ROP-F&W-a-14 What is "an assessment?" It doesn't do much good to require operators to think about things. ROPs should require that they DO things. This requirement shouldn't be very burdensome, so there is no need to add this loophole. Also, this is a requirement of the Migratory Bird Treaty Act anyway, so the ROP has no special benefit.	An assessment means an on-the-ground trip to the site to see if nests are present.
0329-161	ROP-F&W-b What is a "heavy concentration? What are "sensitive" habitats? We agree with your sentiment here, but this objective is overly qualified. A better objective would be to avoid actual negative impacts to wildlife habitats. Also, we are concerned that exceptions are written so broadly in to the ROPs. Also, none of these setbacks mean a thing, without a corresponding requirement to survey for impacted critters. Please include a requirement to survey for fish and wildlife habitat, at the applicant's expense.	The words "heavy concentrations" are confusing and have been deleted in the Proposed RMP/Final EIS (Appendix C). The specific ROP explains what activities are permitted or prohibited and gives a definition of the sensitive habitat to be avoided. And, setbacks do mean a thing when areas are already defined, such as documented bald eagle nests or trumpeter swan nests. Project proposals will need to be considered on a site-specific basis during the NEPA process. BLM has the ability to do cost recovery where potential survey or assessment costs would be significant. This will not be added to the ROPs and stipulations.
0329-162	ROP-F&W-b-1 How did you arrive at 1/4 -mile, May 1-August 31, and 14 days? This stipulation leaves lots of room for Trumpeter swans to be disturbed away from their nests. Please apply the same standards (or, more strict) to oil & gas activities, too. We suggest you add, "do not cause nest abandonment" to this ROP, in addition to the times and distances. This would fill the function of the	1/4 mile and May 1 - August 31 is consistent with State (DNR) guidelines identified for trumpeter swan nesting areas in the Copper Basin Area Plan. The same standards are applied to oil and gas activities (See stipulation 1, p. 627, Draft RMP/EIS). 14 days covers permitted activities outside of oil and gas activity or mining, such as Special Recreation Permits.

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	ROP, without getting hamstrung with inflexible requirements.	
0329-163	ROP-F&W-b-2 How did you arrive at these dates, and the length of activity? What are the "defined" caribou and bison calving areas? This ROP should be written more broadly to apply to all permitted activities that might adversely impact caribou and bison calving. 1,000 feet vertical distance for aircraft is decent, but more important would be a horizontal distance requirement. Also, helicopters are much more disturbing than fixed-wing aircraft, and should be subjected to stricter standards.	Dates are consistent with State (DNR) Susitna Area Plan dates and are based on biological considerations to minimize stress during the calving period. Caribou and bison have traditional calving areas which are discrete and finite, and easily protected with seasonal restrictions. Helicopters are included in "aircraft".
0329-164	ROP-F&W-b-3 What is "defined" moose winter range. How did you arrive at these dates and distances? How does one arrive at "documented non-occupancy of the specific area by moose?"	Wildlife habitat maps were compiled from information obtained from ADF&G wildlife atlases (Susitna Basin Area Plan, 1983; Copper River Basin Area Plan, 1985; Alaska Habitat Management Guide - Southcentral Region, 1985; and Yakataga Area Plan, 1993). Dates are based on average occupancy of the winter range areas. One arrives at determination of "documented non-occupancy" by examining the specific site and looking at evidence of winter use (moose pellet density, browse intensity, or presence of moose).
0329-165	ROP-F&W-b-4 How did you arrive at ¼-mile? These setbacks are already required by Fish & Wildlife Service, the ROP shouldn't be expected to make any difference. What do you mean, "appropriate buffers around other raptor nests will be determined based on site-specific analysis?" When? How? By whom?	See response to comment 0312-116.
0329-166	ROP-F&W-b-6 What is "critical" sheep and goat habitat? Please don't rely too much on ADF&G to provide maps, or anything else. Whenever possible, consultation and coordination is very valuable. However, ADF&G is liable to being axed by the legislature or governor, or subjected to undue political pressures within the state. Thanks for including horizontal buffers for helicopters, and the prohibition against heli-ski landing in critical	"Critical" will be changed to "crucial" in the Proposed RMP/Final EIS. Crucial is any habitat occupied in the winter, and any lambing or kidding habitat. And…we find local ADF&G to be an invaluable resource and will continue to utilize them in project planning, review, and cooperation.

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	ranges.	
0329-167	ROP-Water-a-1 is very weak. What are "minimal" impacts? Please apply these setbacks to all facilities, not just permanent oil & gas ones. We find it curious that this "requirement" is actually written in the negative: as in, "don't do X, if you do Y," rather than, "Do X, unless Y." Is there a difference?	Minimal impacts are those that do not create significant disturbance. Requiring setbacks for all facilities might preclude recreation developments such as picnic tables or outhouses.
0329-168	ROP-Water-a-2 is the same as ROP-F&W-a-3, except weaker. Constructing roads within floodplains is crazy, except if very unusual circumstances. Please don't allow it.	ROP-Water-a-2 avoids road construction in floodplains. To say that none would be allowed under any conditions would eliminate any possibility for future road construction.
0329-169	ROP-Water-b, c, and d these objectives are pretty mellow—not very ambitious. These requirements seem largely meaningless, as they are just repetition of state water quality standards. While the requirements contain lots of obviously good ideas, we don't see anything new here. How would these ROPs be any different from the status quo? Also, we doubt the feasibility of many of them. For example, the requirement in b-7 that "riparian vegetation…will be reestablished" is another Jedi mind trick.	These ROPs are much more specific than the current set of stipulations. See response to comment 0329-133.
0329-170	ROP-Water-c-7 is a great idea. Thanks. How effective will this ROP be? How is it different from the status quo?	We anticipate a high degree of effectiveness. Current stipulations call for general revegetation and development of a reclamation plan in larger mining operations. This ROP will apply to all permitted activities (not just mining).
0329-171	ROP-Wetlands-a please work to preserve the full range of ecosystem services provided by wetlands, rather than just those directed at specific resources. This objective is fine, while not very ambitious. Of course management will try to avoid negative impacts. As opposed to what?	Thanks for the comment.
0329-172	ROP-Veg-a-1 Please include specific notice and public review of timber sale and prescribed burn plans, and require that a BLM forester and	Timber sales or prescribed burns on BLM-managed lands are subject to an appropriate NEPA analysis and public review. All NEPA analyses involve interdisciplinary review.

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	wildlife biologist concur with the plan.	
0329-173	ROP-Veg-a-3 How will this be implemented? Wouldn't it be easier to just wash them all down?	This would be implemented by making it a part of the timber sale contract and the Authorizing Officer making sure it gets done. This is standard practice in many areas in the lower 48.
0329-174	ROP-Veg-a-4 Without any scale, this requirement is impossible NOT to meet.	No, this is definitely not a prescriptive ROP. However, when combined with the vegetation objective (ROP-Veg-a), it makes it clear that intense prescribed burns that result in large-scale vegetation composition change are unacceptable.
0329-175	ROP-Veg-a-6 Why should grazing be allowed on BLM land, if they have to pack in feed?	The ROP, as stated, says "in areas of low grass production, operators will pack in weed-free hay or concentrated feed."
0329-176	ROP-Veg-a-7 Is worthless without a survey requirement. Please require surveys prior to approval of plans.	This will be a consideration during implementation-level NEPA analysis. BLM, Glennallen Field Office is attempting to refine it's information on sensitive plant species so that specific habitat types can be "flagged" to identify the need for a specific survey prior to development.
0329-177	ROP-Veg-b-1 What is the basis for these depths? Please make this a requirement.	The presence of 12 inches of frozen ground eliminates potential for any soil disturbance.
0329-178	ROP-Veg-b-3 How will this be implemented?	By site specific analysis and location of trails on ridge-tops or in areas where breakage or compaction of vegetation would be minimized.
0329-179	ROP-Veg-b-5 is a Jedi mind trick that won't be feasible to implement.	Why not? There are examples in the Copper Basin of past timber sales where natural regeneration has worked just fine and provides excellent shrub-dominated wildlife habitat in the interim.
0329-180	ROP-Cultural-b These requirements are empty. Who will do the evaluations and studies? Unless it's an archaeologist, this ROP doesn't do much good.	That's why we have a cultural resource specialist on staff at the Field Office and this is what he spends most of his time doing.
0329-181	ROP-VRM-a Through experience, we have no confidence in this measure to protect ecological functions. Visual resources should be the last priority. We don't support hiding resource extraction. If we're going to abuse the planet, then stick it out there for all to see. For the sake of honesty.	Your experience must not have been with BLM at this Field Office, because we have not had VRM classes in place until this planning effort. Please hold off on your judgment until we've had a chance to implement.
0329-182	ROP-Haz-a garbage should be hauled to the dump, not just out of site.	We agree, as stated in ROP-Haz-b-2.
0329-183	ROP-Haz-c-1 Is this in addition to existing C-plan laws? Without a way to review such plans, and assure they are sufficient, this ROP doesn't mean much.	I don't know what "C-plan laws" refers to. And these Hazardous Materials Emergency Contingency Plans would be reviewed by the Authorized Officer.

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0329-184	ROP-Haz-c-5 What is "sufficient?" Who determines it? This is already the law.	Sufficient is enough to prevent impacts to fish, wildlife, and the environment from hazardous materials, oil spills, and other chemical spills, as stated in the objective. It is determined by the Authorized Officer.
0329-185	ROP-Haz-c-7 is great, but already the law. Also, how will this be applied in vast wetland areas?	It will be applied as written.
	CLIMATE CHANGE	
0312-137	The area covered by the Draft RMP/EIS will be dramatically affected by climate change over the time period of the plan. In a few places in the document, changes to soils, forest fire regimes and vegetation are mentioned. However, we believe that the Draft RMP/EIS does not go into enough detail on how the agency will develop management strategies to adapt to the expected changes. In particular, we encourage BLM to specify how expected changes to permafrost will be incorporated into transportation corridor planning, OHV use, and oil, gas and mineral extraction. This should include expected impacts to water quality from oil, gas and mineral leasing as the permafrost melts and impact on wildlife from leasing as migration patterns change. We also encourage BLM to proactively look at how changes to wildlife patterns will affect subsistence use in this area. Please address these issues in the Proposed RMP/Final EIS.	Climate change and it's anticipated effects on vegetation cover, wildlife, and fisheries is discussed in more detail in the Proposed RMP/Final EIS (page 315).
0323-16	EPA acknowledges that the interaction between land use and climate change is complex and not fully understood at this time. However, we recommend that BLM recognize the need for land management strategies that anticipate and mitigate for changes in land cover considering the potential for climate change and potential changes to climate change due to land use decisions and resource development. We recommend BLM	See response to comment 0312-137.

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	incorporate this information into the final RMP and EIS, and strive to address potential environmental impacts relative to climate change in future land management decisions. EPA is interested in assisting BLM in these efforts.	
0329-92	We are very interested that "climate change will impact soils in the area, probably to a greater extent than any other activity analyzed in this EIS." (p.366) Impact them how? What management options are available to deal with it? How will these changes impact oil & gas exploration and development, mining, logging, beetle outbreaks, and wildfires? What monitoring are you doing to evaluate it? What impact is climate change likely to have on salmon, and fish resources?	See response to comment 0312-137.
0380-3	And another thing that I did not hear today is global warming. The fish that came up this summer, I noticed, was almost all hatchery fish. Fish don't usually turn red by the time they get to Copper Center. When they get to Gulkana, to Gakona and when they get to the tributaries, that's when they start turning colors.	See response to comment 0312-137.
	WILDERNESS	
0006-6	Some reasonable portion of the lands within the planning boundary should be managed to protect their wilderness values (I also believe that BLM should be making recommendations in the plan for lands that should be formally designated Wilderness by the Congress--in spite of Secretary Norton's order, which is quite likely illegal). By doing so the BLM will be protecting at the same time air and water quality, soils, vegetation, fish, wildlife, subsistence resources and opportunities, scenic beauty, quiet recreationists seeking a refuge from the nearly constant noise in most	We will be managing to protect wilderness characteristics by managing approximately 63% of BLM-managed lands to maintain a primitive recreation experience, which provide opportunities for solitude and a high degree of naturalness. These are not, however, de-facto wilderness areas and do not preclude other resource management activities.

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	of our cities and larger towns--as well as ecotourism operators trying to market a wilderness experience which many of our visitors wrongly assume they'll be able to find in Alaska without spending hundreds of dollars to fly long distances away from the road system.	
0006-18	Secretary Norton has told the Bureau that they're not to consider lands for official wilderness recommendation. I think, still, as a multiple use manager and as an agency trying to provide a spectrum of opportunities, you have the responsibility to provide wilderness opportunities as well as more developed opportunities, that's de facto, wilderness as opposed to designated wilderness.	Please see page 15 of the Draft RMP/EIS, under Lands with Wilderness Characteristics. As explained there, in many cases, we will be managing to maintain the current primitive recreation experience.
0165-1	BLM should actually perform wilderness review of several areas of critical environmental concern--those included in alternative C: West Fork trumpeter swan habitat; Delta bison calving area; and Nelchina caribou calving area.	Please see response to comment 0367-2.
0166-1	[D]o wilderness reviews of all roadless areas.	Please see response to comment 0367-2.
0167-1	I am especially concerned that areas of Alaska be reviewed for potential wilderness description and that actions not be taken that would imperil such designation.	Please see response to comment 0367-2.
0168-1	BLM should undertake Wilderness Review for this area and ensure that resources are adequately addressed.	Please see response to comment 0367-2.
0312-129	We note that none of the alternatives specifically mention as an issue the identification of areas within the Eastern Alaska Planning Area that may warrant consideration for designation of Wilderness or Wilderness Study Area (WSA). The Federal Lands Management Act (FLPMA) states, The	Please see response to comments 0367-2 and 0312-133.

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	Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern…(43 USC 1711(a)). ...BLM should consider Wilderness in this planning process. … BLM is required to complete resource inventories and land use plans under the authority of FLMPA 201 and 202.	
0312-130	According to BLM policy, wilderness is a resource, which fits within the framework of multiple-use on the public lands. In addition NEPA requires the BLM to inventory all of resource values including the impacts to those values in land use plans. "The creation of wilderness is a reasonable alternative." Sierra Club v. Lyons, No. J00-0009-CV (D. Alaska March 30, 2001).	Please see response to comments 0367-2 and 0312-133.
0312-131	We understand that an inventory process for the Eastern Alaska Planning Area has been started but remains incomplete. Recreational Opportunity Spectrum, while important within the planning process, does not take the place of a Wilderness Inventory. This inventory should be completed and should include a thorough wilderness review and inventory of the Eastern Alaska Planning Area and forwarded to Congress. We strongly urge BLM to recognize wilderness as a resource category. Section 1320 of ANILCA also provides guidance for the BLM's management of wilderness as a resource. Wilderness is a multiple use under the Federal Land Policy and Management Act of 1976 (43 U.S.C. §§ 1701(a)(8), 1702(c)).	Please see response to comments 0367-2 and 0312-133.
0312-132	It is imperative at this point in the planning	Please see response to comment 0367-2.

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	process for BLM to ascertain the resource values on the public lands in Eastern Alaska, and one of those resources must include wilderness quality before the Draft EARMP/EIS. We support the use of the Recreational Opportunity Spectrum and designation of deserved areas as “primitive”. However, this should not take the place of Wilderness inventory, recommendation, and ultimately, designation.	
0312-133	We strongly object to Secretary Norton’s decision. It is not a citizen-based policy. It sets up restrictive conditions that are not required by ANILCA or the Wilderness Act. The Secretary’s decision thwarts the very kind of local consensus building she calls for to support wilderness. She falsely claims that Alaska BLM lands have been exhaustively reviewed for wilderness when in fact there has never been such a review.	Please see response to comment 0367-2. Public comment played a large part in proposals within the range of alternatives for management of primitive ROS classes, including management for non-motorized recreation areas.
0312-134	The EARMP/EIS preliminary alternatives are in adherence to the Secretary’s memo. If BLM continues the public process without including a wilderness inventory and recommendations, we believe the plan is in violation of law. For the reasons discussed above, NEPA and FLPMA require BLM to consider potential wilderness as a reasonable alternative for any resource management plan in Alaska. For this reason, the draft EARMP/EIS for the must include a reasonable range of alternatives that include recommendations to Congress for new wilderness designations.	NEPA says nothing about wilderness inventory or consideration in Alaska. FLPMA , Section 603 (43 U.S.C. 1782) directs the Secretary to review roadless areas for wilderness characteristics. However 43 U.S.C. 1784 specifically exempts Alaska from this consideration. However, it does state that "the Secretary may identify areas in Alaska which he determines are suitable as wilderness and may, from time to time, make recommendations to the Congress for inclusion of any such areas in the National Wilderness Preservation System…" Clearly, as stated on page 15 of the Draft RMP/EIS, this is at the Secretary's discretion.
0329-8	We strongly support recommending the Bering Glacier country to Congress for Wilderness designation. This reasonable alternative should be evaluated in a Revised EIS/RMP. ...Wilderness designation is appropriate here.	We agree that the area possesses the characteristics you describe, which is why it classified as primitive in our Recreation Opportunity Spectrum class (pp. 174- 177, Draft RMP/EIS). For the Wilderness designation, please see response to comment 0367-2.

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	Indeed, this rugged, remote landscape epitomizes Wilderness, as defined by the Wilderness Act, 16 USC §1131(c) ... The Bering Glacier region is Wilderness in fact. It is one of the most remote places in the world. Nobody lives there. In all likelihood, nobody ever will. The area is traditionally entirely uninhabited by human beings, something that can't be said about other recently designated Wilderness in Alaska. There are no permanent human structures here. A person would have to look hard to find any evidence of humanity. "Primeval" is a perfect word for this place. There are outstanding opportunities for solitude and primitive recreation. Designation here would create the biggest contiguous Wilderness area in the world, together with the Wrangell St. Elias, Glacier Bay, Kluane, and Tatshenshini-Alsek parks. This extraordinary place is recognized by the United Nations as a World Heritage Site, due to its "outstanding universal value." Also, the area to the south is protected as Yakataga State Game Refuge (Mooney & Speerstra 1999), and to the west, Chugach National Forest.	
0329-10	Our earlier, repeated requests at public meetings and in written public comments that Wilderness be considered have been dismissed in the Draft EIS/RMP. The only substantive reason given is that "this proposal is inconsistent with the planning criteria described in Chapter I." (p.31) Why? What planning criteria? Your criteria ought to be based on public comment, not the other way around. If they conflict, then change your planning criteria. There is no point in soliciting public comment if you're only going to listen to the comments you want to hear.	Your page 31 citation is related to Alternatives Analyzed but Not Considered in Detail, specifically a transfer of BLM-managed lands in the Bering Glacier Area to the National Park Service. "This proposal is inconsistent with the planning criteria" does not refer to Wilderness inventory or designation in this planning process. Please see response to comment 0367-2.

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0329-11	It is inappropriate to exclude Wilderness Inventory and Management from the scope of the plan. (p.14-15) The Secretary's policy ceding this authority to Alaska's congressional delegation is illegal. Public comments can't be erased just because they might not agree with the comments of Alaska's congressional delegation. The Draft EIS/RMP claims this alternative doesn't even need to be considered, because the it "considers alternatives that provide a full range of protection for the natural and cultural resource values found in the Bering Glacier area." (p.31) That is clearly untrue. Even the "conservation" alternative opens additional lands at Bering glacier to mining, and oil & gas drilling. There are no alternatives regarding methods of management of the science camp, which is by far the biggest impact around.	As stated on page 15 of the Draft RMP/EIS, "Congress has granted the Secretary the discretion to determine whether further wilderness inventory, review and study of BLM lands in Alaska is warranted." Clearly, she has used this discretion and made a decision. Part of her decision directs us to "consider specific wilderness study proposals in Alaska, as part of any new or revised resource management planning effort, if the proposals have broad support among the State and Federal elected officials representing Alaska." Perhaps this is who you should be directing your comments to.
0329-12	Not only does the Draft EIS/RMP refuse to consider any Wilderness Alternative, but it neglects to consider impacts of proposed action alternatives on Wilderness values. It is revealing of a misplaced ideology that the Draft EIS (p.15) deals with Wilderness Characteristics exclusively in terms of recreation. There are important values of Wilderness designation besides "primitive recreation." Our primary interest in Wilderness designation on the Bering has little to do with recreation. It has everything to do with a healthy ecosystem, humble respect for the land, The primary value of Wilderness here would be preserving the integrity of wildlife habitat, natural processes, and the intrinsic values of Wilderness. Scientific benefits are a very nice bonus. Passive use values also deserve considerations. Many people, including our members, value this wild place as	The preferred alternative of the Draft RMP/EIS would designate BLM-managed lands in the Bering Glacier area as a Research Natural Area. Measures prescribed under this management scenario would strive to keep healthy ecosystems healthy, because the unique ecosystems associated with the glacier and it's forelands are the subject of much of the on-going research.

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	a wild place, with intrinsic value. People are not in charge here. That has value, to a person in Cleveland. It has even more value to a seal on Vitus Lake.	
0329-13	We aren't convinced that the proposed action is an improvement over doing nothing. The benefits of RNA designation are largely negated by opening it to oil & gas and mining. The BLM science camp at Bering Glacier is having significant negative impacts that are ignored in the Draft EIS/RMP. Please consider and disclose these impacts, and give us some reasonable alternative ways to manage them. For example, do they really need to cook with microwave ovens? To use helicopters so much? To maintain a permanent facility? To keep such a large facility? To use ATVs? What kind of implementation-level plan will there be, and how will it be enforced? We recommend a "closed" designation for motorized use here. If a researcher needs to buzz a machine around for a study, they can justify it in a permit request. The Draft plan doesn't address the threat of boats on Vitus Lake, and the other terminal lakes, rivers, and area wetlands. Airboats in particular are a potentially serious concern. (Mooney & Speerstra 1999) Motorized water vessels are a major disturbance to seals and some birds.	The likelihood of mineral development taking place in the eastern 2/3 of the BLM-managed lands in the area is very low. This due to rough topography, poor access, very little existing infrastructure, and a volatile climate. Impacts of the Bering Glacier Research camp will be considered in the implementation planning effort for the RNA. Research activities and the facility and aviation to support such activities will need to be balanced with objectives for the area.
0367-2	I understand that wilderness inventories were not conducted during your planning process. Why is this, when so much of the land included possesses wilderness characteristics?	Please see pages 14 and 15 of the Draft RMP/EIS. This provides an explanation of why BLM did not conduct wilderness inventory as part of this planning process and why BLM will not consider Wilderness or Wilderness Study Area designations as part of this planning process. It also explains how BLM has inventoried and considered lands with wilderness characteristics in this planning process.

4. LANDS AND REALTY

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GENERAL LANDS AND REALTY		
0354-18	Some assumptions in the RMP are incorrect and unrealistic, and a plan based on inaccurate assumptions is doomed to failure, such as: "1) ANCSA and State land entitlements will be fulfilled in the 20-year planning period." With all the contested issues, many will only be resolved in court.	BLM stands by this assumption. Recent legislation has taken steps to speed up the conveyance process and BLM is committed to fulfilling State and ANCSA entitlements.
0354-36	Maintain subsistence opportunities and resources with land exchanges and cooperative agreements (MOU's and MOA's) to enable framework for co-management of some ecosystems and affected lands.	BLM, as part of this planning process, has already entered into MOUs with several villages. An MOU with Ahtna, Inc. is currently being worked on. The preferred alternative (D) identifies several areas that would be considered for land exchanges (including the Chistochina/Slana area) once entitlements are met (p. 109, Draft RMP/EIS).
LANDS AND REALTY PROGRAM AND ADMINISTRATION		
0044-3	"Airstrips in trespass" (p.165) mentions none by name. What are BLM plans for the half of the Susitna Lodge airstrip on BLM land?	The Susitna Lodge airstrip is on an 80-acre patented parcel and is not in trespass.
0175-29	Pages 103 and 104, Land Use Authorizations, Permits. ANILCA Section 1316 allows the use of shelters, tent platforms, and other temporary facilities and equipment used for hunting or fishing on Bureau lands, as follows: (a) On all public lands where the taking of fish and wildlife is permitted in accordance with the provisions of this Act or other applicable state and federal law the Secretary shall permit, subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities. Such facilities and equipment shall	BLM feels that the preferred alternative is already consistent with Section 1316. It allows for construction of such temporary facilities, under the appropriate permit and subject to reasonable regulation. The wording has been changed in the Proposed RMP/Final EIS, (page 122) to say "No new permanent structures would be built…".

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	be constructed, used, and maintained in a manner consistent with the protection of the area in which they are located. All new facilities shall be constructed of materials which blend with, and are compatible with, the immediately surrounding landscape. Upon termination of such activities and uses (but not upon regular or seasonal cessation), such structures or facilities shall, upon written request, be removed from the area by the permittee. We request the Bureau revise alternatives in Chapter II Lands and Realty and in related tables to reflect this provision.	
0329-47	Why not give lands to the Park? One manager is better than two are. One big management unit is better than two small ones.	Please see Planning Criteria #1, page 16 of the Draft RMP/EIS: The principles of multiple use and sustained yield as set forth in FLPMA will be applied in the RMP.
PUBLIC LAND ORDER (PLO) 5150		
0003-1	[T]his hunting and fishing needs to be kept primarily for the local people because we live here. …[A]s I see it now the proposals that maintain the Corridor in Federal ownership would be the best for the people of this Valley.	Alternatives A, C, and D (BLM's Preferred Alternative) propose to maintain the Corridor in Federal ownership.
0004-1	But most of the area over here is closed to caribou hunting and that little section [PLO 5150, transportation and utility corridor] is about probably the only place where you could go and just get a permit and be able to go there without going through the Tier II process. So we really do not want the BLM to turn that over to the state of Alaska.	Please see response to comment 0379-1.
0006-11	The pipeline corridor should remain in federal hands. Many local subsistence users lack opportunities on state land and depend on being able to hunt on federal lands, including, very importantly, the pipeline corridor, which constitutes 63% of the federal subsistence lands in the region (and ones which, significantly, are accessible to those who don't	Please see response to comment 0010-3.

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	hunt with an ORV).	
0006-15	Like everybody else already this evening, I oppose transferring the pipeline corridor to the State. It would have a devastating affect on subsistence uses in this area. And I also am not really terribly confident about how the State would manage those lands in other ways, I don't think that they do a terribly good job of managing general State lands in lots of instances, of course, there are exceptions.	Please see response to comment 0010-3.
0007-1	I prefer to hunt under the federal regulations rather than the state regulations. The federal seasons are longer and generally easier to obtain permits. I do not have a boat, a snowmachine, or a four-wheeler. I do not have an airplane to access federal hunt areas in unit 11. The federal hunt areas in unit 13 are along the highway where I have access them. If the pipeline corridor is transferred to the state, it will be very hard or impossible for me to meet my subsistence needs. I am strongly opposed to any alternative that would reduce or restrict federal subsistence hunting opportunities.	Please see response to comment 0010-3.
0008-1	I am opposed to any alternative that would allow the transfer of the pipeline corridor to the state of Alaska. … The area covered by Public Land Order 5150, or the pipeline corridor, represents some of the Ahtna people's traditional hunting grounds. This area is a key hunting area, and has been recognized as that for a long time. … I am unable to get a state tier II subsistence permits for caribou and moose. The federal lands in unit 13 are the only viable option for continuing to live and teach a subsistence lifestyle. The federal hunting areas are especially valuable for teaching young hunters who may never qualify for a state permit. The transfer of the pipeline	Please see response to comment 0010-3.

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	corridor would significantly reduce the area where local hunters could legally hunt under federal regulations. The federal hunting areas in Units 11 and 13 outside the pipeline corridor are generally inaccessible except by boat, off road vehicle, or by air. This would create an even bigger hardship for elders and low income individuals who do not have the means to access these remote parcels.	
0009-1	I'm here to represent my son, Shawn Sanford, Jr., and he was born with multiple allergies of all kinds. What he was eating in the end was just caribou and cranberries. And the only way we can get it is through the Paxson area. If we're not allowed to hunt there [pipeline/utility corridor] anymore then he won't be able to get caribou, which is the only thing he eats.	Please see response to comment 0010-3.
0010-1	There aren't that many jobs, year-round jobs here in the Basin, and a lot of people depend on subsistence hunting to supplement their food supply, caribou and moose especially. I've been out with airplanes, hired airplanes to take me out hunting, and that's costly. A lot of our elders and Native people who are unemployed can't afford this kind of transportation, they can always get a ride to hunt up and down the road. Alternative B I'm opposed to, period. I would not want to see the state of Alaska take over subsistence hunting and fishing within here, although I don't think fishing is included here. The reason is that it's pretty understandable that the state of Alaska generally over the years has opposed subsistence hunting preference for rural people, rural Alaskans like the Copper River Basin residents here.	Please see response to comment 0010-3. Social/economic effects of this action are displayed in the Draft RMP/EIS in Chapter 4, page 528.
0010-3	The reason that revocation of 5150 was so important is that it would negatively impact our	Thank you for the comment. The impacts of revocation of PLO 5150 on subsistence are analyzed on pp. 525-529 of the Draft RMP/EIS as well as in the Section 810 Analysis on

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	subsistence lifestyle if the State of Alaska took over the management of the pipeline corridor lands.	pages 651-652. This (pp. 525 - 529) includes a discussion of the effects to social and economic conditions and environmental justice. Alternatives A, C, and D (BLM's preferred alternative) propose the maintenance of most or all of PLO 5150. BLM has complied with ANILCA in this planning process by providing the opportunity for public testimony on an action that would cause a significant impact on subsistence use or resources, even though it is NOT the BLM's preferred alternative. BLM is committed to complying with ANILCA in this planning process and in implementation-level planning, as described on page 149 of the Draft RMP/EIS, # 2.
0010-5	In 1972 I was one of the first employees of AHTNA, Inc., and we met with BLM, I'm talking about BLM, nationwide BLM, we're talking about the director of nationwide and their assistant and regional director here in the state of Alaska, to protest the utility corridor. At that time we found out that the utility corridor was, in places, eight miles wide, we didn't see any reason why a pipeline needed that much land to build a pipeline in certain locations. AHTNA, Inc., wanted to select these lands and we stated our concern about this whole issue at that time. But now we're where we are today and I just can't strongly enough say that we oppose Alternative B as proposed in the Resource Management Plan which would revoke PLO 5150.	Please see responses to comments 0010-3 and 0375-4.
0016-1	And right now that's where the elders hunt, they road hunt when caribou go through and by taking that [PLO] 5150 away it would put a burden on them because they can't get out to where the caribou is at.	Please see response to comment 0010-3.
0017-4	[T]his is an ANILCA .810 hearing and I am strongly opposed, as is my organization, to Alternative B, to lift that withdrawal 5150, both the voices of the residents and the numbers show that that would cause significant impact, and under ANILCA .810, that's what you're asking for tonight, will this cause significant impact and I'd like my testimony to be on the	Please see response to comment 0010-3.

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	record and say, yes, we believe it would.	
0020-10	PLO-5150, please don't give it to the state of Alaska. They're the most hostile government that us poor Natives can deal with and they do not protect our subsistence needs. And that's the one Federal hunt that some of our elders are allowed, and if it's removed that's the only Federal hunt they have.	Please see response to comment 0010-3.
0020-14	The PLO 5150, you want to do away with our Federal hunt, now is that in accordance with the policy to protect subsistence? No, it is not.	Please see response to comment 0010-3.
0022-1	When you say that subsistence is a separate issue from these withdrawals, but, de facto, if these withdrawals of the Pipeline Corridor are made, that's exactly what it is, is a near termination of subsistence.	Please see response to comment 0010-3.
0024-1	I just want to briefly say that opening or giving that pipeline corridor back to the State would be just drastic because my dad's been hunting down there for years, you know, he's old. It gives all the elders a place to go road hunting.	Please see response to comment 0010-3.
0028-2	The Federal lands or the Pipeline Utility Corridor, which is in Paxson, Sourdough and Tonsina, these are the traditional areas of the AHTNA people. These are the places where most of the AHTNA people hunt to get their caribou and moose. We also pick berries on these lands. We have used these areas for thousands of years to have our subsistence needs met. The reason we use them is because we're not able to, or we cannot afford to buy ATVs or other off-road vehicles, we hunt with automobiles. And because these Federal lands are along the road system, that's where most of us hunt because it's easy, it is accessible. Now, the remaining lands that would be left if this decision is made and the Federal public lands or the Pipeline Utility	Please see response to comment 0010-3.

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	Corridor is revoked, then that would be 63 percent of the land that would be taken, and the remaining lands would be inaccessible for our people, the AHTNA people, because these lands that would be left would be 20 miles or more off the road system. We would never be able to go up and hunt at the Gulkana upper river portion of the Wild and Scenic River, that upper portion where it is because we don't have the means to travel off-road. Our region is one of the most highest unemployment rate in the state of Alaska and most of our people are below the poverty level so we can't purchase ATVs, like I said, to hunt with and to travel 20 miles off the road. According to BLM, 80 percent of our harvest takes place within the Pipeline Utility Corridor. This shows that we hunt in this area and that's where our moose and caribou are taken. The rural priority would be useless to us if these lands were revoked because the lands remaining would be accessible. We would not have our ANILCA needs met if this is revoked. The only other lands that I saw was Unit 11, Wrangell-St. Elias Park and Preserve and the upper portion of Gulkana River, they're both inaccessible unless you have a boat or an airplane to travel across, it would be hard to access that area to hunt in. And I want to say that under the State management system, since the McDowell decision was made in 1989, everyone in the state of Alaska has reasonable opportunity to hunt and to harvest caribou and moose. Since 1989, when the Alaska Supreme Court made this decision it has greatly affected our subsistence use. The reason is and I've said over and over again, is that, you know, we don't have ATVs to hunt with and we have an impact in Unit 13 during the hunting season.	

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	The last point -- there are other points I wanted to make but since I've got one minute left I just want to state that in ANILCA it states in Section .810 that no withdrawal, reservation, lease, permit or other use occupancy or disposition of the public lands which would significantly restrict subsistence uses shall be affected unless a hearing is held and three determinations are made by the Federal agency. One of the determinations that can be made is that a significant restriction of subsistence use is necessary, consistent with sound management, principles of the utilization of the public lands. According to this section of ANILCA I want to point out that revoking the Pipeline Utility Corridor and transferring these lands to the state of Alaska would drastically and adversely impact the AHTNA people in the AHTNA region. Alternative B would give lands back to the State and restrict our hunting subsistence hunting areas. This would unnecessarily restrict us to hunt on those remaining lands that are inaccessible to us and our subsistence needs would not be met under ANILCA because our Federal lands would be greatly reduced, as mentioned earlier, 63 percent of the lands would go back to the state of Alaska. I am opposed to Alternative B and prefer Alternative A for Public Land Order 5150, which is to take no action.	
0031-1	I'm just up here to oppose transferring the pipeline corridor over to the State. Being from the Gulkana area, we have many trails crossing the pipeline corridor to where we do our trapping and subsistence activities. I feel it would be detrimental to us if it were transferred over to the State.	Please see response to comment 0010-3.
0041-2	I oppose the transfer of the Fels Glacier and	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to

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	the lower Canwell Glacier to the State of Alaska. Under State mismanagement, considerable damage has occurred in the Canwell area (while Nevada Star was exploring for minerals).	allow conveyance of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0042-2	One of the most beautiful areas, the Canwell, has even been opened to mining exploration. I oppose the transfer to the State of these areas on the grounds that they haven't shown good management!	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0045-1	I oppose transfer of the Fels (Eel on some maps) Glacier and lower Canwell Glacier to the State. These areas, contiguous to the Castner Glacier, should be managed in a similar manner. I am not happy with state mismanagement in the Canwell area where considerable resource damage has been allowed unchecked by Nevada Star Company, in the process of their exploring for minerals.	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0055-2	I oppose transfer of Fels (Eel) Glacier and lower Canwell Glacier to the State because of the history of unnecessary surface damage allowed by the State in the Canwell area during mineral exploration by Nevada Star.	Thank you for your comment. Alternatives A, C, and D (BLM's preferred Alternative) do not propose allowing the conveyance of this land to the State of Alaska.
0059-2	Some things we strongly disagree with on alternative B's proposal is to relinquish lands to the State along the pipeline corridor. These lands are vital to subsistence hunting and any transfer would impact communities who use this corridor for hunting.	Please see response to comment 0010-3.
0060-4	I'd like to briefly touch upon the question of the Pipeline Corridor, and very, very strongly suggest that Alternative B should be avoided in this case, particularly because this hearing is addressing subsistence issues. Transferring management of this land back to the State would be deleterious for a wide range of stakeholders, including subsistence users, in	Please see response to comment 0010-3.

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	this case.	
0060-15	The State of Alaska would like the BLM to lift withdrawals that are currently in place to make lands in the Pipeline Corridor available for State selection. This action is included in the RMP in Alternative B. … We oppose this alternative, based on the fact that is would unnecessarily impinge upon traditional hunting practices. Economic impacts to rural families and communities dependant upon subsistence hunting in this area would be devastating. We also oppose this alternative on the grounds that it would increase traffic in the pipeline corridor, thus exacerbating the habitat fragmentation caused by that corridor.	Please see response to comment 0010-3. Social/economic effects of this action are displayed in the Draft RMP/EIS in Chapter 4, page 528.
0062-2	I also want to voice my opposition to removing the pipeline withdrawals, allowing the state to select the pipeline corridor. It appears that this action would jeopardize the Delta Mountains non-motorized areas.	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0075-1	We would like to go on record as opposing that component of Alternative B in the Draft East Alaska Resource Management Plan and Environmental Impact Statement that would revoke PLO 5150 withdrawals and allow conveyance of the transportation and utility corridor lands to the State of Alaska. Such an action would have a negative impact on federally qualified subsistence users in the area, particularly with regard to their access to caribou, and has the potential to also result in increased hunting pressure on the lands and resources in Wrangell-St. Elias National Park and Preserve.	Please see response to comment 0010-3
0075-2	Alternative B would revoke PLO 5150; this act withdrew some Federal public lands from selection by the State of Alaska. This would allow future transfer of ownership of Federal	Please see response to comment 0010-3.

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	public lands to the State of Alaska; this would effectively eliminate the applicability of the ANILCA protections that currently insure the continuance of customary and traditional subsistence cultural and social practices. We strongly oppose these alternatives because of their adverse effects on subsistence users.	
0077-2	The transfer of the Fels Glacier and lower Canwell Glacier to the State should not take place, since the area is contiguous to the Castner Glacier and should be managed in a similar manner. Further, witness the State mismanagement in the Canwell area where they allowed Nevada Star company to significantly damage an area I have used for recreational purposes for many years.	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0080-1	Now therefore be it resolved, the Southcentral Regional Council strongly recommends that the transportation and utility corridor remain under the jurisdiction of the Federal Subsistence Board, because of the unanimous opposition of the subsistence users to revocation of PLO 5150. The testimony and personal knowledge of the Regional Council members demonstrated high reliance on the Federal subsistence hunt for moose and caribou in this area, with Elders and young hunters particularly depending on road access in to these Federal lands. Local testimony emphasized the expectation that the Federal government should protect the subsistence rights under Title VIII of ANILCA. Testifiers notes that the State lacks a rural subsistence priority, and that the State Tier II provides a very limited alternative opportunity. Few local residents of Units 11 and 13 obtain the Tier II permits, and young people are especially unlikely to obtain Tier II permits.	Please see response to comment 0010-3.

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0081-1	Whereas, the Ahtna people have harvested and used subsistence resources in the lands under consideration since time immemorial, and; Whereas, the Gulkana Village and other Ahtna Villages have been recognized as having customary and traditional use, and; Whereas, under the Federal Subsistence Management Program over 3000 permits were issued to residents in the communities recognized as customary and traditional users, and; Whereas the transportation and utility corridor provides 80% of the moose and caribou harvested by these communities, and; Whereas under the State of Alaska Tier II permit system for the same period only 243 hunters from these communities received a permit to harvest caribou and moose, of which Gulkana received less than 10, and; Whereas the State of Alaska does not have the capability to provide a meaningful subsistence priority use for rural residents of the Ahtna villages, and; since 1991, the Federal Subsistence Management Program as managed these lands in order to meet the subsistence needs of the local and rural residents, and; Whereas the Bureau of Land Management through the Glennallen Field Office has been working with the Southcentral Regional Advisory Council and local residents to address their subsistence concerns, and; Whereas, the Southcentral Regional Advisory Council, after preliminary review of the draft plan, spoke out strongly against the conveyance of these lands to the State of Alaska, among other concerns. Now therefore be it resolved that the Gulkana Village Council strongly re-comments that the transportation and utility corridor remain under the jurisdiction of the Bureau of Land Management, because	Please see response to comment 0010-3.

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	of the irreversible and irretrievable loss of area available for subsistence hunting under the Federal subsistence regulations that would result from the transfer of these land to the State of Alaska, and; Further be it resolved that the Gulkana Village Council requests that the BLM carefully consider the recommendations from the Southcentral Regional Council and Ahtna villages (local subsistence users) about the other concerns raised about the draft resource management plan.	
0082-1	Whereas, the plan notes that the "conveyance of the transportation and utility corridor to the State as proposed under Alternative B, would constitute an irreversible and irretrievable loss of area available for subsistence hunting under Federal subsistence regulations, and; Whereas, the Ahtna people have harvested and used subsistence resources in the lands under consideration since time immemorial, and; Whereas other communities in the Copper River Basin and surrounding areas have been recognized as having customary and traditional uses along with the Ahtna villages; Whereas, under the Federal Subsistence Management Program over 3000 permits were issues to residents in the communities recognized as customary and traditional users, and; Whereas the transportation and utility corridor provides 80% of the caribou and moose harvested on Federal lands, and; Whereas, under the State of Alaska Tier II permit system for the same time period, only 243 hunters from these communities received a permit to harvest caribou and moose, and; Whereas the State of Alaska does not have the capability to provide a meaningful subsistence priority use from rural residents of the Ahtna villages,(within the planning area) and; Whereas since 1991, the	Please see response to comment 0010-3.

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	Federal Subsistence Management Program has managed these lands in order to meet the subsistence needs of the local and rural residents, and; Whereas the Bureau of Land Management through the Glennallen Field Office has been working with the Southcentral Regional Advisory Council and local residents to address their subsistence concerns, and; Whereas the Southcentral Regional Council, after a preliminary review of the draft plan, spoke out strongly against the conveyance of these lands to the State of Alaska, among other concerns. Now Therefore be it resolved, that the Native Village of Gakona strongly recommend that the transportation and utility corridor remain in Bureau of Land Management because of the irreversible and irretrievable loss of area available for subsistence hunting under the Federal subsistence regulations that would result from the transfer of these lands to the State of Alaska. Be it further resolved, that the BLM carefully consider the recommendations from the Southcentral Regional Council and Ahtna villages (local subsistence users) about concerns raised about the draft resource management plan.	
0084-2	[A]ccording to your draft East Alaska RMP, the proposal to transfer of 438,000 acres of federal pipeline corridor land to the State of Alaska would "constitute an irreversible and irretrievable loss of area available for subsistence hunting under federal subsistence regulations." I am shocked that BLM would consider an option that would cause such devastating economic impacts to rural families and communities dependent upon subsistence hunting in this area. I urge you to keep these lands in federal ownership and to not include this action in the final resource management	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM's preferred alternative.

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	plan.	
0086-1	I oppose the proposal to transfer 438,000 acres of federal pipeline corridor lands to the State of Alaska. I feel that the federal government is a better long term steward of this land & protector of the wide range of interests in the area.	Thank you for your comment. Alternatives A, C, and D (BLM's preferred Alternative) propose the retention of all or most of the pipeline corridor in Federal ownership.
0097-8	AQRC [Alaska Quiet Rights Coalition] strongly opposes the Alternative B proposal to permit conveyance of the Pipeline Corridor to the State being included in the Preferred Alternative at the time of Plan approval. We oppose it not only for its substantial adverse impact on local subsistence hunting, but because we believe it would eliminate any areas closed to snowmachines in the Preferred Alternative, and substantially reduce the areas in Alternative C which are to be closed to snowmachines.	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0122-1	I think the proposal to transfer 438,000 acres of federal pipeline corridor land to the State of Alaska is ill-advised …because land for all of the American people should not be given to one state's people, particularly since that state would then have control.	Thank you for your comment. Alternatives A, C, and D (BLM's preferred Alternative) propose the retention of most or all of the pipeline corridor in Federal ownership.
0159-4	I wish to strenuously object to the possibility that the Transportation and Utility Corridor could be acquired by the State of Alaska. The Plan makes clear how important the Corridor is for the federal subsistence user, in terms of hunting success as well as inexpensive access. There is no question in my mind that the urban hunting community would eagerly flock to the Corridor and vastly increase competition with all local hunters. It is my understanding that those who testified at the 810 hearings were overwhelmingly against such a transfer. In light of such solid	Please see response to comment 0379-1.

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	opposition, BLM has a high standard to meet in order to justify honoring such a selection by the state. Moreover, a simple acre by acre relinquishment of state selected lands would not satisfy what I assume is a general trust responsibility owed by BLM to Native hunters who use the Corridor, beyond the procedural requirements of 810.	
0160-1	I am also concerned that in alternative B, a proposal to return the pipeline corridor to State administration has been identified. I do not believe that a adequate analysis of the impacts was completed in the draft. Many issues were not analyzed. I would not support this alternative for several reasons. 1. Reduction of the amount of land available for subsistence; 2.Loss of oversight authority by the joint pipeline office in the running and safety of the pipeline operations. I also believe that this proposal would be a precursor to turning over the entire pipeline to state management.	The effects of the revocation of PLO 5150 are analyzed on pp 383, 403, 415, 429, 442, 467, 481, 496, 518, 525-526 of the Draft RMP/EIS. Impacts to subsistence were analyzed consistent with ANILCA Section 810 in Appendix E of the Draft RMP/EIS. Some information has been added to the Proposed RMP/Final EIS (Chapter 3, pp. 326-327 and Chapter 4, pp. 549-550) regarding the effects on the Joint Pipeline Office and how this would impact pipeline administration and maintenance. BLM feels that the analysis presented in the Proposed RMP/Final EIS adequately portrays the impacts from the revocation of PLO 5150. Alternatives A, C, and D (BLM's preferred alternative) propose BLM retention of most or all of the pipeline/utility corridor.
0164-51	We do not support Alternative B which allows for the revocation of PLO 5150 because of the significant impact that action would have on our subsistence lifestyle.	Please see response to comment 0010-3.
0164-65	We oppose Alternative B, which would "revoke ANCSA d(1) withdrawals and PLO 5150, which would open up 98 percent of the land base to mineral extraction, including oil and gas.	Thank you for your comment. Other levels of withdrawal revocation are considered in alternatives A, C, and D.
0164-66	We oppose Alternative B under Issue 4: Lands and Realty, which will revoke PLO 5150 and allows for conveyance of the transportation and utility corridor to the State of Alaska. … Units 11, 12 and 13 are Ahtna People's customary and traditional use areas since time immemorial. Most of the Ahtna People do not have the means to travel off the highway system to hunt for caribou and moose; the	Please see response to comment 0010-3.

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	pipeline utility corridor is accessible and is a prime hunting area for caribou and moose because of the migration route located in the pipeline utility corridor. … If PLO 5150, which makes up the transportation and utility corridor, was revoked, it would remove 63% of the land currently in the Federal Subsistence Hunting program in Unit 13. The State does not provide a rural priority; it provides for a seasonable opportunity for subsistence uses for all residents. The Ahtna People's subsistence needs will not be met if we have to hunt under State regulations. Tier II Subsistence Hunting Permit Point System is flawed, and many of the younger generations, those less than 50 years old, are not awarded a Tier II caribou and moose permits; thereby creating hardship to continue our subsistence lifestyle. All local residents will be forced to hunt in Unit 11 and 12, which is not accessible, unless a person has a boat or can pay airfare to hunt on NPS Federal lands. Revoking the transportation and utility corridor will "significantly restrict subsistence uses" and will have an "adverse impact" upon the federally qualified subsistence users.	
0164-68	Section 810 requires that an evaluation must be done to determine what "significant adverse impact has affected subsistence uses, when federal lands are removed or leased," etc. We know without a doubt that revoking PLO 5150 will bring about a "significant and adverse impact" to local residents who are federally qualified subsistence users.	Appendix V of the Draft RMP/EIS contains the required ANILCA Section 810 analysis for the Draft RMP. Please see response to comment 0010-3.
0164-69	The Secretary of the Interior and BLM must evaluate Section 810 carefully to "take reasonable steps to determine revoking the transportation and utility corridor, and	Appendix E of the Draft RMP/EIS contains the required ANILCA Section 810 analysis for the Draft RMP/EIS.

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	determine whether it will have significant adverse impacts on subsistence uses" in the Ahtna Region.	
0172-1	Whereas, the plan notes that the "conveyance of the transportation and utility corridor to the State as proposed under Alternative B, would constitute an irreversible and irretrievable loss of area available for subsistence hunting under Federal subsistence regulations, and; Whereas, the Ahtna people have harvested and used subsistence resources in the lands under consideration since time immemorial, and; Whereas, under the Federal Subsistence Management Program over 3000 permits were issues to residents in the communities recognized as customary and traditional users, and; Whereas the transportation and utility corridor provides 80% of the caribou and moose harvested on Federal lands, and; Whereas, under the State of Alaska Tier II permit system for the same time period, only 243 hunters from these communities received a permit to harvest caribou and moose, and; Whereas the State of Alaska does not have the capability to provide a meaningful subsistence priority use from rural residents of the Ahtna villages, and; Whereas since 1991, the Federal Subsistence Management Program has managed these lands in order to meet the subsistence needs of the local and rural residents, and; Whereas the Bureau of Land Management through the Glennallen Field Office has been working with the Southcentral Regional Advisory Council and local residents to address their subsistence concerns, and; Whereas the Southcentral Regional Council, after a preliminary review of the draft plan, spoke out strongly against the conveyance of these lands to the State of Alaska, among	Please see response to comment 0010-3.

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	other concerns. Now Therefore be it resolved, that Cheesh-na tribal Council strongly recommends that the transportation and utility corridor remain in Bureau of Land Management because of the irreversible and irretrievable loss of area available for subsistence hunting under the Federal subsistence regulations that would result from the transfer of these lands to the State of Alaska. Be it further resolved, that the BLM carefully consider the recommendations from the Southcentral Regional Council and Ahtna villages about concerns raised about the draft resource management plan.	
0173-35	PLO 5150 (pipeline/utility corridor) should be modified to allow for mineral entry (leasing and locatable) in all but a 1/2 mile wide corridor for the pipeline ROW and to allow for existing State selections to fall into place.	Both these modifications are presented and evaluated under Alternative B throughout the Draft RMP/EIS document. See Map 19, pp. 107 and 126.
0173-37	Any designations within the pipeline corridor should not preclude the use of the corridor for its intended purpose as a transportation and utility corridor.	BLM agrees with this statement and the preferred alternative (D) does not change the purpose or the activities allowed in the transportation and utility corridor. Page 292 of the Draft states "Future pipeline needs … could be accommodated along this existing route."
0173-38	The PLOs along the inner and outer pipeline corridor must be investigated in detail to support removal of all but a 1/2 mile wide corridor for the pipeline ROW centered on TAPS.	This is considered in Alternative B of the Draft RMP/EIS.
0174-1	I oppose the state assuming subsistence rights over unit 13 or parts thereof. If the state were as fair in their administration of subsistence as the feds, I would have no objection.	Please see response to comment 0010-3.
0175-2	[T]he State does not support BLM's proposed retention of PLO 5150, the Trans-Alaska Pipeline Utility Corridor. The State believes that state ownership of the corridor is appropriate and we consider this to be a high selection priority. The land was withdrawn to enable	Revocation of PLO 5150 is proposed and evaluated throughout the Draft RMP/EIS under Alternative B. See pp. 107 and 387. This is not BLM's preferred alternative.

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	construction of the Trans Alaska oil pipeline, which has now been in place for over 25 years. Rights-of-way for a future gas line are also already in place. Considering that the future use of the corridor for oil and gas transportation is assured, there is no need for federal retention of the corridor. In addition, portions of the PLO 5150 corridor within the planning area do not even include the existing or proposed oil or gas line. A good example of this is the portion of PLO 5150 within T 20 S, R 12 E and T 21 S, R12 E, where the pipeline routes are actually on adjacent state land located to the west of the PLO 5150 lands. In many cases the lands withdrawn by PLO 5150 are adjacent to and in some cases surrounded by state-owned land. Revoking PLO 5150 within this planning area would allow the state to own and manage larger contiguous blocks of land rather than continuing the present situation where BLM lands are essentially inholdings. Furthermore, allowing state selection and conveyance of PLO 5150, may in fact make state selected lands in other areas of the planning area available for long term BLM management, potentially creating a larger more manageable block of contiguous BLM land. This approach has the potential to facilitate more effective and efficient land management practices for both the State and BLM.	
0185-2	I am opposed to the pipeline corridor transfer as proposed in Alternative B. There will be no management tool in place under state management should this transfer occur. More important is the loss of 438,000 acres of Federal Subsistence lands, an “irretrievable loss” as noted in the BLM draft.	If the transfer were to occur, the State of Alaska's laws and regulations would apply to the land once they are conveyed. The lands would still be open to hunting under the State's sport hunting or subsistence regulations. Also please see response to comment 0010-3.
0306-4	I am opposed to the pipeline corridor transfer	Under State administration, the pipeline corridor would be managed under their laws and

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	as proposed in Alternative B. There will be no management tool in place under state management should this transfer occur. More important is the loss of 438,000 acres of Federal Subsistence lands, an “irretrievable loss” as noted in the BLM draft.	regulations. State management direction for most of the area can be seen in DNR's Copper Basin Area Plan (1985). The revocation of PLO 5150 is not proposed in Alternatives A, C, or D which is the BLM's Preferred Alternative.
0308-3	Maintaining the Trans-Alaska Pipeline utility corridor under BLM management for access to subsistence hunting.	Please see response to comment 0010-3.
0311-5	This transfer [revocation of PLO 5150] violates the intent of ANILCA to preserve the traditional subsistence rights so important to tribes and rural community residents.	Please see response 0010-3. The ANILCA 810 analysis that was done as part of the Draft RMP/EIS did find that revocation of PLO 5150 would result in a significant impact to subsistence uses and opportunities.
0312-91	We strongly oppose the BLM to even consider revoking PLO 5150. The potential impacts to subsistence hunting on federal lands would be dramatic.	NEPA requires BLM to consider a range of alternatives in an environmental impact statement. Alternative B of the Draft RMP/EIS contains revocation of PLO 5150 as requested by the State of Alaska. Presenting this action as an alternative allows the impacts of that revocation to be presented, analyzed, and commented on by the public. This analysis is outlined in Chapter IV of the Draft RMP/EIS on pages 525-529 as well as in the Section 810 Analysis on pages 651-652. The public comment on the issue is also presented in Appendix J of the Proposed RMP/Final EIS. Revocation of PLO 5150 is not the BLM's preferred alternative but is presented as a basis for comparison of impacts between proposed management actions.
0312-92	In addition to our support of the 28 residents that testified against the revocation of PLO 5150 on July 27, 2005 at the Southcentral Alaska Subsistence Regional Advisory Council special session, we support the Wrangell-St. Elias National Park Subsistence Resource Commission’s letter stating opposition to the recommendation of the revocation of the ANCSA d(1) and PLO 5150 withdrawals in Alternative B. Some of these comments that were raised that should be of particular concern when drafting the revised version of the draft or the Proposed RMP/Final EIS: A majority of the hunters use the highway to hunt and do not own ATVs The displacement of hunters would put pressure on other lands,	Please see response to comment 0010-3. Potential effects of this action to subsistence hunting in Wrangell-St. Elias National Park and Preserve will be discussed in the Proposed RMP/Final EIS in Chapter 4 (page 568 and 575).

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	such as National Park Lands off the Nabesna Road.	
0321-2	We are concerned about the pipeline corridor transfer, these 438,00 acres of land comprise the majority of federal subsistence lands in East Alaska. We cannot support this transfer with these impacts to rural subsistence.	Please see response to comment 0010-3.
0323-1	Although not currently included in the Preferred Alternative (Alternative D), EPA is very concerned with Alternative B's proposal to revoke Public Land Order 5150 and allow conveyance of the transportation and utility corridor land to the State of Alaska. As stated in the Draft EIS, opportunities for subsistence hunting would be negatively impacted by conveyance of this corridor to the State of Alaska. We believe that the conveyance, with the resulting management of subsistence species and use and resource extraction and development that would likely occur, would cause significant adverse impacts to subsistence resources and subsistence users in several Environmental Justice communities…. EPA recommends that BLM's final Preferred Alternative not include conveyance of this portion of the planning area to the State of Alaska. We recommend that these lands remain in federal ownership and continue to be managed to maintain and enhance subsistence opportunities and resources.	Thanks for your comment. Please see response to comment 0010-3.
0328-1	Whereas, the Ahtna people have harvested and used subsistence resource in the lands under consideration since time immemorial, Whereas, other communities in the Copper River Basin and surrounding areas have been recognized as having customary and traditional uses along with the Ahtna villages, Whereas,	Please see response to comment 0010-3.

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	under the Federal Subsistence Management Program close to 3000 permits were issued to the 3300 households in the communities recognized as customary and traditional users, Whereas, the lands in the transportation and utility corridor provides 80% of the moose and caribou harvested by these communities, Whereas, under the State of Alaska Tier II permit system for the same time period, only 159 hunters from these communities received a permit to harvest caribou, Whereas, the State of Alaska does not have the capability to provide a meaningful subsistence priority use for rural residents of the Ahtna villages (in the planning area) Whereas, since 1991, the Federal Subsistence Management Program has managed these lands on [sic] order to meet the subsistence needs of the local rural residents, Whereas, the Bureau of Land Management through the Glennallen Field Office has been working with the Southcentral Regional Advisory Council and local residents to address their subsistence concerns, Whereas, the Southcentral Regional Council, after a preliminary review of the draft plan, spoke out strongly against the conveyance of these lands to the State of Alaska, among other concerns, Now therefore be it resolved that Tazlina Village Council strongly recommend [sic] that the transportation and utility corridor remains in Bureau of Land Management, because of the irreversible and irretrievable loss of the area available for subsistence hunting under Federal Subsistence regulations that would result from the transfer of these lands to the State of Alaska, And be it further resolved that the BLM carefully consider the recommendations from the Southcentral Regional Council and Ahtna	

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	villages (local subsistence users) about other concerns raised about the draft resource management plan.	
0329-77	Why doesn't the Draft EIS mention anything about the TAPS Right-of Way? This is by far the most significant BLM thing here. Even the cumulative effects section ignores this ticking time bomb in our midst. Please consider the grave risks this awful pipe poses to the planning area.	The TAPS right-of-way is contained within the Transportation and Utility Corridor (PLO 5150). The current status of this corridor is outlined on page 292-295 of the Draft RMP/EIS including a map showing the location of pipeline in relation to the corridor. The effects of the TAPS was evaluated in 2002 through the Trans-Alaska Pipeline Right-of-Way Renewal EIS which was written by BLM and the Joint Pipeline Office (Draft RMP/EIS, page 20). This Draft RMP/EIS is consistent with the Renewal EIS and does not reiterate what has already been evaluated through the NEPA process. The Proposed RMP/Final EIS has been edited to include a discussion of the effects of revocation of PLO 5150 on TAPS in Chapter 4 (pp. 568, 575) .
0329-131	We strongly oppose relinquishing PLO 5150, the transportation and utility corridor. This is a critical area for subsistence. The state does not guard subsistence, and would not be a competent land manager of this corridor.	Please see response to comment 0010-3
0331-12	We strongly urge that BLM not consent to the State of Alaska's request for transfer of the pipeline corridor to the State. Because few year-round jobs are available, residents of the Copper Basin rely heavily on subsistence hunting. Because of deficiencies in the State's Tier II hunting permit system, a small and declining number of Copper Basin residents qualify to hunt caribou on state lands. For the rest, the federal pipeline corridor provides the best opportunity for obtaining meat.	Please see response to comment 0010-3.
0331-13	Another reason for retaining the corridor in federal ownership is that it contains 14% of the Tiekel SRMA under Alternative C and 100% under alternative D's interim management. Under current state management practices, we cannot expect restrictions on motorized recreation. If the pipeline corridor were transferred, there would be no Tiekel SRMA under alternative D's interim management, and under alternative C, non-motorized users would	The effects on recreation that would result from revocation of PLO 5150 under Alternative B are displayed on pp. 384 – 388 of the Draft RMP/EIS. This analysis includes discussion of management without designation of the proposed SRMAs. There has been additional analysis added to the Proposed RMP/Final EIS regarding this topic (page 426, Proposed RMP/Final EIS).

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	have to pass through a motorized zone to reach the SRMA.	
0341-6	According to page 552 of the draft East Alaska RMP, conveyance of the transportation/utility corridor land to the State would "constitute an irreversible and irretrievable loss of area available for subsistence hunting under federal subsistence regulations." Economic impacts to rural families and communities dependant upon subsistence hunting in this area would be devastating. This transfer violates the intent of ANILCA to preserve the traditional subsistence rights so important to tribes and rural community residents. In addition, the transfer may affect the Joint Pipeline Office structure. At a time when we cannot access certain pipeline information because of national security, and when pipeline monitoring and protection has taken on new importance, it seems unreasonable to transfer these lands to state oversight. The BLM should retain the corridor lands.	Please see response to comment 0010-3. The ANILCA 810 analysis that was done as part of the Draft RMP/EIS did find that revocation of PLO 5150 would result in a significant impact to subsistence uses and opportunities. Also, please note that a section will be added to Chapter 4 of the Proposed RMP/Final EIS describing the effects of the revocation of PLO 5150 on the Joint Pipeline Office and subsequent administration and maintenance of the pipeline (pp. 549, 550, Proposed RMP/Final EIS).
0342-1	The NPS is concerned that this action [revocation of PLO 5150 and conveyance of the transportation and utility corridor to the State of Alaska] will have a significant impact on subsistence activities for those communities having customary and traditional use determinations in Unit 13, many of which are resident zone communities for Wrangell-St. Elias National Park. Removal of the pipeline and utility corridor from federal subsistence management jurisdiction through conveyance to the state would virtually eliminate local harvest of the Nelchina caribou herd and thereby significantly restrict local residents' access to this important subsistence resource.	Please see response to comment 0010-3.
0342-2	The removal of a substantive area of	Please see response to comment 0010-3. The Proposed RMP/Final EIS acknowledges

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	accessible federal land in Unit 13 could increase the hunting pressure on nearby lands managed by Wrangell-St. Elias National Park and Preserve. Other than a small area of land along the Denali Highway, the only other road-accessible land under federal subsistence jurisdiction in Unit 13 is in Wrangell-St. Elias National Preserve near Slana. This area would likely experience increased hunting pressure, especially by local subsistence hunters interested in harvesting caribou. Units 11 and 12 within the Park and Preserve could also see increased pressure from moose hunters (there are no open seasons for caribou in those portions of Units 11 and 12 that fall within the Park and Preserve.) These areas could see increased hunter competition as well as increased off-road vehicle traffic, both of which have the potential to negatively impact park resources. The consequences Public Land Order 5150 withdrawals on NPS administered lands needs to be evaluated in the EIS. For these reasons the NPS does not support that component of alternative B that would revoke PLO 5150 withdrawals and allow conveyance of the transportation and utility corridor lands to the State of Alaska.	that displacement of hunters would occur and place additional demands on other federal lands in the area (page 568).
0346-2	I oppose transferring the Fels Glacier and the lower Canwell to the State of Alaska due to the messy and poorly planned development currently occurring adjacently at Rainbow Mountain.	Please see response to comment 0160-1. This proposal (revocation of PLO 5150 to allow conveyance to the State of all of the pipeline/utility corridor) is not part of the BLM' preferred alternative.
0354-14	ALTERNATIVE B, with PLO 5150 completely revoked is completely unacceptable as we would lose 453,514 acres of federal subsistence hunt that provides 80% of federal subsistence caribou herds. … We prefer that PLO 5150 be maintained for use as a	Please see response to comment 0379-1.

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	transportation/utility corridor, since a management action to revoke PLO 5150 has an EXTREME NEGATIVE IMPACT ON OUR SUBSISTENCE LIFESTYLE.	
0355-16	If PLO 5150 for the actual TAPS right of way is not removed, at a very minimum the right of way should be decreased from what is now many miles (over 10 miles in some locations) to a width of one mile. There is no question where a future gas line will go and a one mile width will accommodate a sufficient width for the new gas line.	Alternative B considers your suggestion. It is not the preferred alternative.
0357-1	Chitina Native Corporation does not offer any support to alternative B of the draft plan. This alternative would have to many sever impacts to subsistence in rural Alaska and change the way of life there to drastically. The possibility of revoking PLO 5150 more specifically is what raises great concern to us. There are so many rural residents that rely upon these Federally administered lands to take any action to remove them and change the hunting areas forever to offer any support for such an action.	Please see response to comment 0010-3.
0374-1	My dad's name is Mentasta Pete. He raised me subsistence style. He taught me that money is not important, that food is more important. You can't eat gold, you can eat food. That is the way I was brought up. I'm against 5150 because it further oppresses our people.	Please see response to comment 0010-3.
0375-1	Sections 801-816 [of ANILCA] declare as Congressional policy the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public land as essential to their physical, economic, traditional, and cultural and social existence. … In order to continue	Please see response to comment 0010-3.

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	this protection of subsistence priorities, the BLM should retain the lands in PLO 5150 in federal ownership and control and thus avoid greater development to the impairment of subsistence uses.	
0375-2	ANILCA, §§1101-1113, provides conditions for granting transportation and utility rights-of-way over many of the public lands in Alaska. Section 1107 requires the Secretary to include in any right-of-way issued a requirement to protect the interests of individuals living in the general area of the right-of-way for subsistence purposes. Unless the federal managers retain control over the TAPS right-of-way, this requirement will be lost and the subsistence rights will not enjoy the protections guaranteed the local residents when the PLO 5150 right-of-way was established under federal law years ago.	Please see response to comment 0010-3. Also, section 1107 of ANILCA describes conditions under which rights-of-way will be considered across Conservation System Units.
0375-3	[T]he State has never adopted an acceptable subsistence priority amendment to the Alaska Constitution. As a matter of law, rural residents are NOT granted any type of priority or subsistence rights under State law. See McDowell v. State, 785 P.2d 1 (Alaska 1989). And the subsistence regulations ("Tier II") that have been adopted have severely limited the rights of rural inhabitants to engage in a subsistence lifestyle. Conversely, ANILCA invokes the Constitutional authority of the United States over Native affairs and under the property and commerce Clauses to protect the continuation of subsistence uses on public lands by Native and non-Native residents. § 802. A transfer of public lands within the PLO 5150 withdrawal to the State will greatly imperil the subsistence rights that remain for the rural residents living in the Ahtna region.	Please see response to comment 0010-3.

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0375-4	[T]he lands within the pipeline corridor, that is PLO 5150, were selected by Ahtna, Inc., under authority of ANCSA, 43 U.S.C. §§1601, et seq. That Act intended that the ANCSA corporations have priority over state selections of lands within the region. Section 11 declared that all lands within designated townships were withdrawn from all forms of appropriation including State selection rights under the Statehood Act. Section 12 authorized Native corporations to make land selections from these withdrawn lands. Ahtna, Inc. selected lands within PLO 5150 but was told by BLM that the lands were not available for Native selection. Now the BLM apparently has offered as an alternative in its RMP a right of the State to select these previously withdrawn public lands. Ahtna's statutory selection rights should protected and recognized and Ahtna, Inc. should be afforded the right to conveyance of these lands over the State as intended by ANCSA.	Please keep in mind that ANILCA allowed the State to top-file (which they did, including over the pipeline/utility corridor). This was NOT a BLM decision. This RMP will not change or amend ANCSA or ANILCA. As clearly stated in Chapter 1 of the Draft RMP/EIS, it will not effect conveyance of lands or meeting State or ANCSA entitlements.
0375-5	I'm here to urge you to retain jurisdiction over PLO 5150 for several reasons. I did submit written comments that outlined the responsibility that's been given to the Federal government to assure protection of certain rights, for instance, the rural preference to subsistence uses on Federal lands. 5150 is about the only conclave, if you want to call it that, of Federal land within the AHTNA region in which rural preference is actually protected. If you were to even consider transferring this parcel to the State, it seems like that would be irresponsible because you wouldn't be fulfilling your responsibility under ANILCA to assure protection of subsistence. And you'd also be ignoring like the history of the state. The State attempted to adopt a rural preference, it was	Please see response to comment 0010-3.

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	found to be unconstitutional. Since that time, that was 1989 I believe, since that time, the elected officials, namely the Governor, has been unable to convince the people of the state to vote an amendment that grants a rural preference to subsistence issues. This is the same Governor who is now asking you to transfer 5150 to the State, it's not only this Governor, it was the Governors before him as well. I don't think that you would see rural preference being protected by the State of Alaska and we would urge you to retain 5150.	
0376-2	We do not support Alternative B, which allows the revocation of Public Land Order 5150 because of the significant impact that action would have on our subsistence lifestyles.	Please see response to comment 0379-1.
0379-1	And I'd like to say this, before you think of--before they think of revoking all this BLM lands and having it over to the State I think that would be one of the biggest impacts on the Native people of the AHTNA area. This is our way of life since we're sovereign, we use subsistence, it's our lifestyle and we done this for years, immemorial. And if this [pipeline utility corridor, PLO 5150] goes to the State, I don't have no trust in the State, because they don't do rural priority.	The effects of revoking PLO 5150 on subsistence, proposed in Alternative B, are evaluated within the Section 810 Analysis and specifically on pp. 651-652. Alternatives A, C, and D (BLM's Preferred Alternative) do not propose this revocation.
0380-1	The Federal land that's selected here to the PLO 5150 I think violates a lot of the autonomy and the sovereignty and the human rights of the--the indigenous rights of our people to this land because when the pipeline went through this land, we didn't have a hearing on it or had a chance to select the sites that our traditional hunting and fishing grounds come from.	As stated in the Draft RMP/EIS (page 13), "decisions made in the RMP will not speed up or affect the land conveyance process."
0380-2	I don't think there was any Congressional hearings or any kind of hearings among the Federal and the State law and the tribal	The conveyance process is out of the scope of this planning document. Please see response to comments 0375-4 and 010-3.

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	governments. We were never given official time to claim, you know, what is our traditional hunting grounds and I think our land claims was settled in 1971 but none of the land was ever conveyed to us through BLM, so we have fiduciary trust responsibilities here. And also the Indian Trust Account goes with the pipeline and I believe that the State of Alaska, they want to tax--they want to get the taxes off that right-of-way and we can go all into other issues here but my concern is about the traditional, customary and religious uses for our potlatches and how its going to be effective on--how are we going to get food when it took the State of Alaska 50 years to destroy our habitat, our fishing and our wildlife, we have a big decline.	
0381-7	Briefly, another issue that we remain opposed to is the revocation of PLO 5150. Should this occur, it would mean loss of ability and overall access to lands that we have used for our subsistence activity.	Please see response to comment 0010-3.
0382-2	Also I want to speak on the Pipeline Corridor with the 5150. Like everybody stated earlier we've lived here all our lives and we've been compromising every year for our subsistence rights. And I don't think we need to compromise any more. That we're entitled to our subsistence rights and the Federal government needs to protect our rights under ANILCA.	Please see response to comment 0010-3.
0383-1	I do not support or endorse the State of Alaska assuming PLO 5150. They have put enough restrictions on the Alaska Native subsistence way of life.	Please see response to comment 0010-3.
0385-1	And, you know, I want to also speak for our people, a lot of our people don't have the employment in the local areas. We don't see employment with the State of Alaska or Bureau	Please see response to comment 0010-3.

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	of Land Management in high percentage. A lot of our people supplement their income with moose and we do -- as a people, we do share our moose and caribou and, you know, subsistence is not phasing out as some might think. … And this is why I oppose the revoking of 5150.	
0386-1	So having said that, you know, that 5150 is an area that is of great concern because that is practically the only area that the villages rely on, ones that didn't get Tier II, ones that don't have the means to go out in deep countries with vehicles, that they have an opportunity at the last 10 days there from the State hunt to get a caribou through that Pipeline Corridor area, which 5150 is going to be very detrimental to them.	Please see response to comment 0010-3.
0386-3	The watershed areas, you know, there's -- we've been in for talks with the Pipeline on the C-plans along the Pipeline, the environmental plans that they're implementing for reconfiguration for the Pipeline and the villages, one of their number 1 concerns of the villages is that the protecting of the fisheries along these river corridors, the crossing. They want to make sure that the Pipeline, the owners are held responsible for making sure that that -- you know, that accident recovery, that the C-plans really address those areas that the Pipeline crosses. And I believe that the Federal permit should really stress that and make these oil pipeline owners responsible for those river crossings.	The description of the Transportation and Utility Corridor in Chapter III has been modified in the Proposed RMP/Final EIS (page 326) to include a section that talks specifically about the TAPS and how it is administered and who is responsible for spill control and maintenance of river crossings. In addition, Chapter 4 of the Proposed RMP/Final EIS has been edited to include a section about the effects of pipeline/utility corridor revocation and transfer to the State on administration and maintenance of the pipeline (pp. 549, 550, Proposed RMP/Final EIS).
0391-1	Yeah, definitely that's the only way that the locals -- the younger generation, and even the older ones, you know, that just moved in the Valley, to get their winter supply of meat is definitely the Federal hunting permits, and we	Please see response to comment 0010-3.

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	definitely support the 5150, not to convey the land to the State. Because their restrictions for hunting is pretty substantial compared to, you know, just the local Federal permit.	
SLANA		
0004-2	There's environmental concerns that we have before any more people move into [Slana]. There's garbage and junkyards all over the place up there and who knows what else is dumped into the ground. And so I have a problem with that, before, you know, selling the land or having home sites given out or whatever, I think, we need to -- it needs to be cleaned up before anything else happens up there.	BLM is committed to a strategy for disposal that would target unauthorized use and the messes associated with it. See response to comment 0065-1.
0004-3	And you have to think about everything else, you know, when the first wave came in there's like there's no jobs and, you know, the Troopers were running up there every day, I mean, you know, we watched that, we live here, we live 30 miles away from there. And it's like before anything like that happens again there needs to be a better plan than just giving the land to private homeowners, there needs to be something else set in place or looked at, some alternative.	BLM is committed to a strategy that would resolve unauthorized use in the area, clean up messes associated with unauthorized use, and facilitate future access. See response to comment 0065-1. This would be done in consultation and coordination with the Slana community as well as Ahtna, Inc.
0020-15	You opened up the Slana area without access. Now, where else in the world do you open an area and not provide access and not protect the adjacent landowners, only in Mentasta, Chistochina, Ahtna lands is how I feel it, nowhere else in the world.	Actually, at the same time Slana was first opened for settlement, BLM opened an area at Lake Menchumina where the only access was fly-in.
0020-29	I've testified a number of times before about the damage that we have sustained in that area due to the Slana home sites. Currently, after people deserted them there's unacceptable amounts of pollutants in the water, in the streams up there, car batteries	BLM is committed to working with the Slana community and Ahtna, Inc. in implementation of the strategy described in response to comment 0065-1. Dealing with unauthorized use through disposal or trespass will facilitate the clean-up of the area.

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	leaking acid, you know, all the refuse dumping from vehicles are still there, that water still trickles into the Copper River. Some protections have to be provided for the headwaters up here because they are getting contaminated without regulation by any of the agencies.	
0023-2	In most of the people's opinion that I've talked to out there, they're in favor of your alternative D [in regards to Slana]. I've heard some very negative comments about Slana settlements, and I have to agree with some of the comments, in that, BLM, when they opened that did not have their poop in a pile, to say the least. Right-of-ways were not planned, access was not planned and, granted, we did get a whole lot of people originally settled out there that weren't respectful of anything. I would say that 95 percent of the people that are left are very respectful of the land and the animals and the way we operate in our community.	See response to comment 0065-1. Also, BLM is committed to working with the Slana community in implementation-level planning in carrying out priorities 1-3 as described in response to comment 0065-1.
0027-3	[T]he opening up of lands [in the Slana area], I think a plan needs to be put in place that addresses the environmental impacts to the surrounding communities, villages and people. The environment is affected when you open up large sections of land and there's no management and there's no infrastructure on how to build up that community to be a sustainable place.	Thanks for the comment. BLM is committed to working with the Slana community and Ahtna, Inc. in implementation of land disposal decisions made in this RMP. See response to comments 0004-3, 0080-2, and 0065-1. Read response to comment 0065-1 first.
0057-1	I'm interested in the lands and realty also that apply in Slana. Again, that area is accessible only by off-road vehicles at this time which is an issue for the subsistence lifestyle that is affected greatly in the fact that if they would just open that land indiscriminately, I would be against it. But under Alternative D, as explained to me, through my reading and	Thanks for the comment. See the BLM's revised strategy for disposal of lands in the Slana area (response to comment 0065-1).

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	through representatives, I believe that Alternative D, a limited opening of that area would be okay, and that it would not adversely affect the subsistence lifestyle.	
0057-2	I do, at this point, agree with a limited opening to occupied sites of unsettled claims that I, personally, have a cabin on one such acreage and I would be willing to settle it that way as the other alternative is just to leave it closed and it's kind of historic that way, too, but a limited opening I would go with, otherwise I would rather have it closed and just remain as it is.	Thanks for the comment. See the BLM's revised strategy for disposal of lands in the Slana area (response to comment 0065-1).
0057-4	In regard to the Slana land settlement. That option of alternative D to sell those failed sites that are still occupied as stated by the BLM under this condition would be an acceptable preferred solution. A general opening of the settlement area I would not support as it would have a negative impact on the subsistence lifestyle of that area. In a well managed disposal of land realty a balance can be obtained.	Thanks for the comment. See response to comment 0065-1.
0057-5	If a sale is not possible [Slana], as in alternative A, then I would support the possible alternative as a leasing option.	Leasing of these lands is not considered under any alternative. Conditions for BLM leases (FLPMA and R&PP leases) are described in the Draft RMP/EIS on page 103.
0065-1	If they put the land up for any sale [any disposal], I would like to see it be offered to the people that have land adjacent to it if they want it or if there are any other circumstances where somebody happened to have a cabin on it or something, I'd like to have that checked out and let them have the opportunity to purchase that property before they put it up to the public.	The preferred alternative (D) in the Draft RMP/EIS identifies approximately 10,000 acres in the Slana settlement area that would be available for disposal. The Proposed RMP/Final EIS will describe the same first two priorities for disposal, which are targeted at resolving unauthorized occupancy and give preference for disposal to failed claimants (see page 109, Draft RMP/EIS). However, the third priority (#3) has been changed to read: "The remaining lands may be disposed of at the discretion of the Glennallen Field Office, in close consultation with the community of Slana and Ahtna, Inc. Further disposals would be used to consolidate land patterns or provide lands for community infrastructure. Disposal to the general public at large by competitive or modified competitive bid will not be considered" (page 121, Proposed RMP/Final EIS).
0072-1	I think it's a bad decision to let people back in to recover property they never got. Because I	Thanks for the comment. Your suggestion is considered under Alternatives A and C of the Draft RMP/EIS. See also response to comment 0065-1.

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	spent many years cleaning up the messes they left all over. I saw much waste of game when in the 80s. Many moose were wasted as well as small game. Many trees were cut down and left to waste.	
0076-1	I and other homesteaders I've talked to firmly believe that making North Slana available for other to occupy is a very bad idea. What concerns long-standing homesteaders is lack of available resources. All of us require and use firewood. Though there are millions of trees, there are few dead standing trees, the harvest of such is a necessity. We take that subject very seriously and guardedly, each using different areas so as not to infringe on each other's needs. Adding firewood collectors to the area would make survival much more difficult and cause conflicts. Another difficulty in adding more trail travelers--is the trail. The more traffic--the worse the trail conditions. This is most obvious during hunting season. Another problem is road vehicle parking, it is limited, and my space I rented. The trail turned into a road is unacceptable.	Thanks for the comment. Based on the strength of public comment, BLM has changed it's strategy for disposal of lands in the Slana area in the Proposed RMP/Final EIS. See response to comment 0065-1.
0080-2	Further be it resolved, the Southcentral Regional Council opposes the provisions of the plan providing for additional disposal of Federal land in the Slana area, based on serious concerns over past and present contamination by abandoned buildings, vehicles, trash from the initial period of homestead disposal. These problems must be cleaned up before any new disposals would be considered.	Thanks for the comment. Based on analysis presented in the Draft RMP/EIS and the strength of the public comment, BLM has decided to revise it's preferred alternative, as described in response to comment 0065-1.
0158-1	My opinion is that North Slana is already overpopulated and any addition to the area would strain the entire eco-system. [sic]	Effects of disposal are discussed in Chapter 4 of the Draft RMP/EIS on pp.434 - 477. BLM's preferred strategy for disposal of lands in the area, based on public comment, is described in response to comment 0065-1.
0158-2	The number one problem being the BLM and its ability to follow through with the proper	BLM has shown a willingness to work with residents of the Slana area on processing applications for rights-of-way. The Slana area will be added (page 122, Proposed

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	access rights [in the Slana area].	RMP/Final EIS) as an area where rights-of-way will be considered for access to private lands.
0158-3	If by some chance that the land in North Slana is put up for sale, I would like the first opportunity to buy land adjacent to my property/	See response to comment 0065-1 for BLMs revised strategy for disposal of lands in the Slana area. Your comment would be considered in implementation-level planning for the area.
0164-49	The North and South Slana settlement area must have all the waste (cars, appliances, hazardous materials, abandoned buildings, and general trash) that is currently there cleaned up and the BLM needs to obtain special appropriations for the clean up. The waste is contaminating wetlands, waster sources, wildlife, and natural habitat.	See responses to comments 0004-3, 0080-2, and 0065-1.
0164-50	Ahtna Inc. adamantly opposes the disposal of the remaining North and South Slana settlement area outlined in Alternative D, but does support the BLM in addressing the trespass that is currently taking place there because of the land disposal. Slana is an important natural and cultural place for the Ahtna People, and we have a great interest in the area being actively managed and protected under Federal management.	See responses to comment 0065-1, 0080-2, and 0004-3.
0164-62	Page 549 - Under d) Wildlife, in the second paragraph an impact is notes related to the Slana disposal area that is not included on page 526 in the discussion of the FLPMA disposals, the only notes is for increased demand, wildlife displacement is not noted or referred to under this section and should be.	Thanks for the comment. Based on the changes discussed in response to comment 0065-1, portions of Chapter 4 that deal with the effects of disposal of 10,000 acres have been re-written in the Proposed RMP/Final EIS to reflect the new strategy.
0329-76	We aren't convinced there is any benefit in, or need for, the proposed Slana settlement area. What community interest would it serve? Where is the demand? How much land development is reasonably foreseeable following disposal at Slana? The Slana disposal could have major impacts to water	See responses to comments 0080-2 and 0065-1.

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	quality and fish. Population impacts of that many more residents could be major.	
0373-1	I'd also like to say that I'd like to keep the PLO 5150 as is because it's important to the elders and the young people, because if you take that away it will change their way of hunting.	Thanks for your comment. Maintenance of PLO 5150 and continuation of the federal administration of the subsistence hunt there is a part of the preferred alternative (D) and would also occur under alternatives A and C. Revocation of PLO 5150 is considered in alternative B of the Draft RMP/EIS.
0378-1	Because it's [Slana], you know, it's all our watershed up that way. If any--everything gets destroyed up there because of the disposals, it affects not only us, but all the way down to the Copper River, you know, we need to protect all those lands from things like that. Because it's not only going to affect us it's going to affect everyone down below us.	See response to comment 0020-29.
0381-5	A particular concern to me is BLM's position of disposing of additional land within the north and south Slana settlement area. History tells you that when after the lands became available for disposal in the middle '80s, BLM was in a lose/lose situation. There was no planning done. There was no EIS. There was nothing done. And every Tom, Dick and Harry came to the area to claim a chunk of that land. The land disposal created a welfare type of situation. There was no access in or out and pretty much people had to make do as is. Now, almost 30 years later, the two homestead areas are an accepted fact to the folks who live in this area, like Mentasta and Chistochina. However, this is only a one-sided view and one needs to see the entire picture. I urge you to fly over the area. And in so doing you will find junk and waste of all kinds. You will find abandoned buildings, you will find cars, you will find refrigerators, you find stove and just trash, trash, trash in general. In short it is disgusting and a disgrace. Besides the disgrace mentioned about BLM failed to acknowledge	Thanks for the comment. See responses to comments 0065-1and 0020-29.

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	the people who use the land within that particular area prior to its disposal. They used the land for their subsistence needs. And by disposing that area they created a monopoly type of situation. They did not take into consideration other facts such as the caribou migration route that goes through the area. They did not take into the fact wet lands. They did not take into the fact of the impact that it might have in regards to cultural sites. When I talk about that, I refer to the Soslota area and that of the Batzulnetas area. I also refer to their disregard of migratory birds. But, yet, the BLM in the preferred alternative, wants to open up these lands, to rid themselves from the nightmare of management of the unoccupied areas.	
0381-6	But to me, by opening up these lands [lands in Slana for disposal], it's like saying, let's just sweep this management situation under the rug and hope no one notices. I say, I notice, we notice. And BLM is not only liable, but also responsible for its clean up, the environmental damage and condition that has been created by it and other consequences. We are extremely exposed to this BLM alternative of opening up these lands for settlement. Finally, if this alternative should become a reality, we request that there be extensive consultation between us, as tribes, specifically Mentasta and Chistochina and that of the affected residents within that area.	Thanks for the comment. See response to comment 0065-1 for the revised strategy for the area and response to comment 0020-29 on clean-up of the area.
0396-6	Lastly, the Slana area, under the plan, I believe that we're going to have to make these people responsible, Again, the land giveaway has created problems for AHTNA. There's cars trashed up there, there's -- and these are being left on all private lands of AHTNA, and without	See responses to comments 0080-2 and 0065-1.

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	that land giveaway that would not be a problem. So I believe those areas have to be cleaned up and having these people made responsible for cleaning up that area before there's any more land giveaway in those areas.	
WITHDRAWALS		
0017-3	And the last thing I'd like to talk about 1 is something I'm confused about so I'd like to make a request that it's in the final document; there's a separate process statewide that the BLM is going to initiate soon, I've heard, and that's to look at which withdrawals to remove from opening up more lands to mining. My organization is not opposed to oil and gas or mining, but we'd like a little clarification on how this document, this draft and this Final RMP relates to the bigger picture, look what the BLM will do, look at removing these withdrawals, making more lands available. I'm a little unclear on that, and I'd like to get it on the record to see that cleared up in the final.	Please see response to comment 0312-104.
0020-20	The withdraw, the ANCSA D1 withdrawals. That scares me too. We haven't had a chance to look at this, we don't even know what you're talking about when you--what lands besides PLO-5150 you're talking about withdrawing or, you know, revoking the withdrawal of. I have no idea what you're talking--I haven't heard even had a chance--that scares us.	Withdrawals are discussed on page 291 of the Draft RMP/EIS. Alternative strategies for dealing with withdrawals are summarized on the table on pages 111 and 112. Effects of maintaining or revoking withdrawals are discussed in Chapter 4 of the Draft RMP/EIS. To gain a more complete understanding of the withdrawals and our decisions related to them, feel free to call and talk to any planning or lands and realty staff at 822-3217.
0060-8	All ANCSA d(1) withdrawals should remain firmly in place until comprehension of all their potential ramifications can be understood. Alternative C would thereby be acceptable as a management solution for Leasable Minerals, Oil, and Gas.	This planning process is where we consider the potential ramifications of revocation or maintenance of withdrawals. See the discussion of environmental consequences in Chapter 4 of the Draft RMP/EIS. Our final recommendations will be based on this analysis as well as public comment.
0164-31	Support the BLM in withdrawing lands within the scenic portion of the Delta WSR and its viewshed from mineral entry to provide the	Thanks for the support. This action is considered in the Preferred Alternative (Alternative D) and in Alternative C of the Draft RMP/EIS.

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	maximum protection of cultural resources.	
0164-47	Ahtna Inc. proposes the maintenance of D(1) Withdrawals in areas where there are known and potential cultural sites.	The Draft RMP/EIS considers a range of options for retention of d(1) withdrawals. Alternative C considers retention of withdrawals to provide area-wide protection. Keep in mind that d(1) withdrawals on selected lands are only in place until conveyance occurs. Once Native-selected lands are conveyed to Ahtna or village corporations, the protections you provide are up to you. Until that time, no mineral entry or mineral leasing will occur on selected lands because of a segregation against these activities.
0164-48	Ahtna Inc. does not support the modification of Public Land Order 6329 that is included in Alternative D to allow for mineral entry in the Alphabet Hills area which has traditionally been used for hunting and is part of the migration corridor for the Nelchina Caribou Herd. Ahtna Inc. does not support the availability of the Alphabet Hills area to mineral leasing it should be closed to such developments.	The proposed revocation of this withdrawal will only have an effect if BLM retains lands in federal ownership in the area. Currently, the area is predominantly State, Native, or dual-selected lands. Revocation of this withdrawal would have no effect on selected lands because of the segregation against mineral leasing and mineral entry that applies to selected lands. Once conveyance occurs, it is up the selecting entity whether or not mineral development occurs.
0164-52	Ahtna Inc. supports retention of all D(1) withdrawals. This would provide the greatest protection for natural resources and wildlife habitat.	Please see response to comment 0376-3.
0173-34	All ANCSA d(1) withdrawals should be revoked.	See response to comment 0355-41.
0175-1	During scoping, the State of Alaska requested that existing withdrawals be reviewed and those that are no longer needed for the purpose for which they were withdrawn be revoked. Of particular concern to the State are the Alaska Native Claims Settlement Act (ANCSA) 17 (d)(1) withdrawals. These (d)(1) withdrawals are no longer appropriate for two reasons: 1) most were made to enable ANCSA selections that have long since been completed, and 2) they supported the study of federal lands for possible designation as conservation system units, which was resolved by Congress with the Alaska National Interest Lands Conservation Act (ANILCA). … Furthermore, the PLOs under review are a	The preferred alternative of the Draft RMP/EIS only recommends maintenance of such withdrawals in areas identified as needing the strongest resource protection (Bering RNA or Delta WSR) or in areas where the withdrawal purpose is still relevant (pipeline/utility corridor). The BLM stands by the recommendations in the preferred alternative.

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	series of orders issued by the Secretary of the Interior in the 1970s under the authority of Section 17(d)(1) of ANCSA. Their purpose was to maintain the status quo of the lands in order to complete inventories and assess resources for consideration in land management objectives.1 The State asserts that the Resource Management Planning process provides the mechanism for developing land management objectives and strategies thus obviating the need for continued withdrawals. We therefore question the appropriateness and relevance of maintaining any withdrawals within the planning area.	
0175-30	The State also requests that obsolete power and/or reservoir withdrawals such as along the Nenana River, (ex. PS 450 and PS 403 within Section 10, 11, 14, and 15 T11S, R6W, F.M.) on lands not managed by BLM and PS 450, located just upstream of the Brushkana on BLM land, be revoked.	Under the Alaska Land Transfer Acceleration Act, these withdrawals do not block conveyance or create an encumbrance on selected lands. They will remain in place until conveyance or relinquishment occurs.
0312-104	The analysis of Leasable and Locatable Minerals is also flawed in that it fails to provide any explanation of how this planning process – which will likely result in administrative orders opening to mineral entry lands that have been closed to such entry since before the passage of the Alaska Native Claims Settlement Act – relates to BLM's review of all the d-1 withdrawals statewide, a process that is presently underway. Indeed, the EIS fails to even mention the d-1 review, even though it identifies other plans and planning processes that are relevant to the East Alaska RMP and describes the d-1 withdrawals. See, e.g., EIS at 291. … EIS must explain the relationship between the two processes in order to adequately inform the public about the issue on	There is no explanation of the relationship between the two because the state-wide review started while this Draft RMP/EIS was in print. The analysis and decisions related to withdrawal review in this Draft RMP/EIS and subsequent decisions made in the Proposed RMP/Final EIS are a subset of the information considered and recommendations put forth in the state-wide effort. Management options for withdrawals within this Draft RMP/EIS were subject to extensive public involvement and review. We disagree that our analysis of these withdrawals under the RMP planning process is flawed, simply because it happens concurrent with a state-wide effort. On the contrary, we are satisfied with our analysis because very specific recommendations are made, based on specialist concern and public input.

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	which it is being asked to comment.	
0342-4	The NPS also supports maintaining the closure to mineral entry [PLO 5173] on unencumbered BLM lands east of Icy Bay that are adjacent to Wrangell St. Elias National Park and Preserve.	Thanks for the comment. Your suggestion is considered under alternative C. BLM's proposal to revoke the withdrawal in the eastern 1/3 of the Bering Glacier area is based on: 1) ability to replace the withdrawal with other protective measures as identified in the table on pp. 602 - 604 of the Draft RMP/EIS, and 2) low likelihood of mineral development in the area based on rough topography, limited access, and limited infrastructure in the area.
0355-4	All PLOs should be listed along with an indication whether the original purpose of each has expired. Such "lingering withdrawals" should be recommended to Congress for removal as part of this plan.	There are hundreds of PLOs in place on BLM-managed lands throughout this planning area. All were considered in the planning process, and the major decisions are summarized on pages 106 and 111-112 of the Draft RMP/EIS.
0355-30	Alternative D (page 128) we do not follow the logic that there would be a withdrawal of an additional 16,000 acres for WSR. This is not consistent with the instructions given by the Secretary of the Interior found on page 15.	The discussion on page 15 of the Draft RMP/EIS is about consideration of wilderness inventory and designation in land use planning. The decision you describe would provide stronger protection within an existing Wild and Scenic River corridor. This decision would not add acreage to the existing Wild and Scenic River corridor, nor does it recommend it for wilderness consideration.
0355-41	We concur that Alternative A is not acceptable. This is due primarily to the numerous lingering withdrawals that need to be removed. These are land withdrawals and restrictions for which the original purpose has been satisfied or the need no longer exists. These lingering withdrawals should be removed, no matter which alternative or mix of alternatives is selected and becomes the final plan.	A range of alternative recommendations for withdrawal revocation or retention is considered in the Draft RMP/EIS. Alternative B removes all d(1) withdrawals and Alternative D would recommend revocation of the majority of the withdrawals, with retention of withdrawals in areas the BLM feels warrant the greatest resource protection.
0376-3	Chitina supports the retention of all d(1) withdrawals, d(1) land withdrawals that would provide the greatest protection for natural resource of wildlife habitat.	The preferred alternative in the Draft RMP/EIS recommends revocation of most d(1) withdrawals, to be replaced with measures described in the tables in Appendix B of the Draft RMP/EIS as well as the Required Operating Procedures and stipulations described on pages 607-626. Alternative C considers retention of more withdrawals to provide area-wide protection.

5. VEGETATION MANAGEMENT

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GENERAL VEGETATION MANAGEMENT		
0020-32	We don't want commercial logging and active burns, but, you know, we do need some work in the beetle kill area for fire. One of the things I'd like to caution BLM on is, you know, when you burn an area it takes seven years for the lichen to go grow back for the caribou, it's great for the moose but it's terrible for the caribou, and that's why we've seen such changes in the migratory patterns.	Alternatives B, C, and D of the Draft RMP/EIS provide for some fuels reduction to take place, targeted at reducing the beetle-kill in the Tiekel area. Page 118 of the Draft RMP/EIS describes the use of prescribed fire to enhance caribou habitat. The mosaic burn pattern (used in both caribou and moose habitat enhancement) would ensure the diversity of the habitat available. In addition, under Alternative D (page 118), it states "If large wildfires occur on or adjacent to winter range, changing the suppression class to full or modified would be considered."
0164-55	Ahtna Inc. supports the use of prescribed burning and best forestry management practices for the enhancements of fish and wildlife habitat.	Thank you for your comment. These actions are proposed in Alternative D of the Draft RMP/EIS.
0354-34	With the exception of the beetle kill areas, leave Mother Nature alone and allow public use for firewood in small tracts with no permanent roads. …No commercial logging - no active burns.	Alternative C of the Draft RMP/EIS does not allow commercial timber or salvage sales (page 116). Alternative C and D emphasize temporary roads for personal firewood gathering (page 117).
0376-5	Chitina supports the use of prescribed burning and best forestry management practices for the enhancement of fish and wildlife habitat.	Thank you for your comment. These actions are proposed in the Preferred Alternative (Alternative D) of the Draft RMP/EIS.
FIRE MANAGEMENT		
0020-8	I don't want any prescribed burns without respect to the adjacent land owners.	Page 298 of the Draft RMP/EIS states that "…fire management has been conducted by agreements executed on an interagency, landscape-scale basis since the early 1980s." This effort to coordinate with adjacent landholders would continue with future prescribed burns.
0175-31	Page 114, (2) Fire and Fuels Management. We question whether it is reasonable to expect that key ecosystem components of vegetation composition and structure can remain intact and functioning “within their historical range”	Fire management may have to change with climate variation in order to strive to meet this goal. This could be accomplished through adjusting suppression classes, as described in the Draft RMP/EIS on page 114.

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	given that species' range varies in response to climate conditions. Is fire always a "natural change agent" of Alaskan ecosystems?	
0175-51	Page 515, Alternative C, Prescribed Fire. We oppose the Bureau's intent to preclude controlled burns. Small controlled burns are essential to effectively manage wildlife in the planning region, by restoring a natural fire mosaic after a century of fire suppression. In addition, prescribed fire benefits public safety by decreasing the amount of wildfire fuels, thus reducing disastrous wildfires.	This statement on page 515 of the Draft RMP/EIS is an error and it has been corrected. Chapter II, page 116 for Alternative C states that BLM will achieve habitat objectives through "wildland and prescribed fire." This is the correct information.
0175-61	Page 118, Vegetation Management, Caribou. We do not support stopping a large fire or changing suppression classification because of the potential for "overburning" the amount of caribou range. The fire history of the area is one with many years between fires, and the opportunity to "overburn" is extremely low because of the low annual occurrence of fire in important caribou range. Furthermore, based on our experience, it is very difficult to burn 10% of the range in a decade.	This statement is included in the Draft RMP/EIS to allow future flexibility to respond to potential large-scale burns. The Draft RMP/EIS acknowledges the area's lack of large fires. However, variations in climate could make the area ripe for a large fire.
0329-96	What is the feasibility of prescribed burning 1.5 million acres? (p.403) This strikes us as awfully ambitious, given past experience with prescribed burns in Alaska.	The 1.5 million acre figure came from page 121 of the Draft RMP/EIS and is based on crucial moose winter range. It states that this acreage is identified as "potential" for prescribed burning. This number is not necessarily a goal but will be used to prioritize future projects and focus them on improvement of critical moose range.
FORESTRY		
0164-53	Ahtna Inc. supports controlled authorized timber sales on BLM unencumbered lands with minimum impact for the objectives outlines on page 117.	Thank you for your comment.
0164-54	Ahtna Inc. supports the use of a cooperative agreement to reduce hazardous fuels and improve wildlife habitat on Native-selected lands through the issuing of personal firewood gathering permits.	Thank you for your comment. The Draft RMP/EIS proposes this as a management option in alternative D (the preferred alternative). BLM is currently in the process of signing a cooperative agreement with Ahtna Corporation and this is an issue that can be worked on through that agreement.

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0164-71	Ahtna Inc. supports development of temporary access, near to the Richardson Highway in the Tiekel area to utilize beetle-kill for person firewood gathering.	Thank you for your comment. This action is identified in Alternative D, page 117 of the Draft RMP/EIS.
0175-32	Page 115, Forestry Products. We note that harvesting of timber, especially beetle kill, can benefit moose, but only if site treatment promotes willow, birch, or aspen regeneration. This type of treatment is contrary to current Bureau guidelines on timber salvage methods and means, which require that the soil not be scarified. We recommend the Bureau work with State biologists to develop specific site treatment to prevent logging areas from becoming seeded entirely to grass (such as occurred on the Kenai) or stagnant due to continuance of a deep moss layer.	Depending on the habitat enhancement objective for the forestry project, ROP-Soils-b-2 allows for the "Bulldozing of tundra mat and vegetation is prohibited unless project objectives call for scarification of the site to improve sprouting or seeding success." This allows for scarification to occur if it is consistent with meeting objectives for habitat improvement. BLM is committed to consulting with local ADF&G personnel on vegetation treatment projects.
0329-78	We absolutely support making a few acres here and there available to individual, small mills. If commercial timber sales are considered, in-state manufacture should be required, and local hire encouraged wherever possible.	Within the last 10 years, every BLM timber sale has been logged by a local (Copper basin) mill or operator. Interest outside the Copper Basin is low to non-existent because of the low value of timber here.
0329-79	We strongly oppose the proposed commercial forestry operation in the Tiekel subunit, due to the scale. The preferred alternative would target 144,000 acres for logging, and Alternative B proposes an alarming 360,000-acres of aggressive logging beetle kill. Particularly since Ahtna Inc. has offered up so much to NPI for chipping, and beetle kill has already killed so many green trees, what forest there is should be left standing. While maybe still a lot of forest is left by East Coast standards, there is no excess of mature forest in this area. Soil should not be further degraded, or watersheds further disturbed, by logging.	The 144,000 acres referred to in Alternative B is the area identified that is suitable for commercial logging. This does NOT mean that actual logging would take place on every acre. On the contrary, Alternative D anticipates an actual harvest level just slightly above what occurs now (about 40 acres/year). Chapters 2 and 4 of the Proposed RMP/Final EIS have been edited to reflect actual anticipated harvest amounts under each alternative.

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0329-80	Please remove "commercial wood products" from the issue statement. (p.113) This would be an appropriate secondary goal, but is clearly way down the list of highest or best uses of this land. This land is not particularly productive in terms of producing commercial wood fiber. What logging has occurred has required extraordinary steps to make economic.	The issue statement for Vegetation Management is meant to simply identify all aspects of vegetation management that will or could be covered within the Vegetation Management section. Goals for Vegetation Management are outlined on page 113 of the Draft RMP/EIS as well and clearly show that commercial harvests for the purposes of economic gain are not among BLM's top priorities for the planning area.
0329-81	Fuels reduction is not generally a suitable goal on this land. Defensible space around towns should be a high priority. What is typically meant by "fuels reduction" is just simple logging. Fuels reduction in the backcountry through mechanical treatment is inappropriate.	Fuels reduction as referred to in the Draft RMP/EIS is just that and it would be emphasized in urban-interface areas.
0329-82	Logging beetle-kill spruce does not "improve forest health." (p.117) There is no evidence to suggest that it does. To the contrary, there is quite a bit of evidence suggesting that land disturbance (e.g. from seismic lines, land clearing for settlement) is likely to cause beetle outbreaks. "Land clearing debris provides ideal material for brood development." (Crosby & Curtis 1969. See also Holsten 1994; Safranyik & Linton 1999) Please consider the role of land disturbance as a result of action alternatives—including housing, roads, trails, seismic line, etc.—in spreading the spruce bark beetle infestation.	How can you equate a vegetation treatment such as logging beetle-kill spruce, (which removes the majority of the dead tree), to land clearing or seismic line construction? In these practices (land clearing or seismic line construction), vegetation is often pushed into large berms, which of course provide ideal material for brood development.
0329-83	Where, exactly, would be made available for logging? The Draft EIS/RMP doesn't have maps so it is very difficult to evaluate the proposal.	Map 45 on page 311 of the Draft RMP/EIS shows the areas within the Tiekel Block that have productive commercial timber stands. Although no specific areas are identified for commercial harvest beyond the one small scale project outlined on page 312, it can be assumed that areas identified on Map 45 and the beetle-kill areas on Map 46 of the Draft RMP/EIS would be the areas targeted for forestry practices. Identification of specific areas will occur during project implementation, subject to site-specific NEPA analysis. The Proposed RMP/Final EIS has been edited in Chapters 2 and 4 to present an anticipated level of annual timber harvest per year by alternative.
0329-84	Current state forest practices regulations do not prevent logging of salmon streams on	Any permitted activity would be subject to the ROPs and Stips outlined in Appendix III of the Draft RMP/EIS. Specific to anadromous streams is ROP-F&W-a-2, ROP-F&W-a-6,

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	private land. Even if they did, most of them aren't catalogued. Therefore, it is inappropriate to rely on non-existent regulations protecting salmon in this region.	and ROP-F&W-a-10.
0329-85	Logging roads would not be a useful addition to SRMAs. The Tiekel area specifically would suffer a great deal if logging roads were constructed.	Alternative D emphasizes temporary roads and winter harvests, see page 117 of the Draft RMP/EIS. However, as stated, retention of some roads might be considered if compatible with managing for roaded natural experience.
0329-86	Roads should always be temporary, winter roads. Please include this as a binding stipulation in the RMP. It is not true that winter logging is typical here. The last two years NPI has been logging summers in the Copper valley, and moving to Mat-Su for winters. That operation is ongoing.	On page 117 of the Draft RMP/EIS it states that "Within all harvest areas, the use of temporary road or winter sales would be emphasized." Use of temporary winter roads is also emphasized in ROP-Veg-b-1. However, it is not always possible to conduct operations in the winter.
0329-87	Soil damage from logging is especially keen in this area. "Impacts to soils due to timber harvest at times other than winter and especially when soils are wet could be very disruptive to ecosystems." (p.400) Logging and logging roads have negative impacts to soils. It removes nutrients, causes compaction, rutting, and erosion, and covers native soils with gravel. Also, long-term effects through increased access.	Alternative C and D as described on pages 116-117 of the Draft RMP/EIS, emphasize winter harvests and temporary roads for forestry practices. ROP-soils-b-1 and ROP-Soils-b-2 also deal with soil disturbance and the vegetative mat.
0329-88	What is the impact of large-scale logging on watersheds in this area? We are concerned that logging on a large scale could have significant negative impacts to fish.	The impacts of forestry practices on fish are described on pages 465, 468, 473, and 476 of the Draft RMP/EIS. This is not large scale and BLM does not propose "large scale" logging in alternatives A, C, or D. Even under alternative B, large scale logging would probably not occur because the Copper Basin market does not support it. The Proposed RMP/Final EIS has been edited to include a more specific estimation of anticipated timber harvest by alternative. ROPs aimed at mitigating impact to Riparian Areas and Water Quality are on pages 616-619 of the Draft RMP/EIS.
0329-89	The Draft EIS says: "As the forest canopy develops and the understory species disappear, a site becomes progressively less productive." (p.195) This is simplistic and misleading. The "productivity" of a forest depends what you are looking for. A clearcut is	The sentence following the one identified on page 195 of the Draft RMP/EIS, goes on to explain which animals or species benefit from the differing stages of forest maturity. Productivity in this case refers to quality of wildlife habitat.

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	more productive in terms of volume of wood fiber grown each year, while an old-growth forest is more productive in terms of salmon spawning habitat, while early seral stages are most productive for moose.	
0329-90	What is the basis of your timber inventory? (p.310) When and how did the Forest Service estimate there were a billion board feet of commercial timber in this area? That figure strikes us as astoundingly high. It would be a very poor basis for a sustained yield figure. Surely, much less is actually commercially viable. Climate change is radically changing this area, with unknown impacts on timber volume. This survey was also likely done prior to extensive logging, and beetle kill.	This inventory was conducted by the USFS in the late 1960's. The data was published in 1975 as USDA Forest Service Resource Bulletin PNW-62. It is not used as the basis for a sustained yield figure.
0329-91	Please figure an Annual Allowable cut, before pursuing large-scale commercial forestry on this land.	BLM, under any alternative, will not pursue large-scale commercial forestry in the Copper Basin. There is simply not the market.
0329-94	What would be logged, if you offered all this land in the Tiekel block? What level of demand is there for commercial wood products?	We don't know what exact areas would be selected for logging out of the 144,000 acres identified as suitable under Alternative D of the Draft RMP/EIS. This RMP makes a decision that this (commercial harvest) is an allowable use for these 144,000 acres. Proposals for timber harvest within this area would be considered in site-specific NEPA analyses. Page 312 of the Draft RMP/EIS talks about the demand for forestry products within the planning area. The Proposed RMP/Final EIS includes, in Chapters 2 and 4, an estimate of anticipated actual harvest per year, by alternative.
0329-95	What do you mean that forestry impacts from 144,000 acres of logging would be "slight to insignificant?" (p.422) What do those words mean?	As stated, this assessment is based on measures identified in the ROPs as well as the fact that logging would NOT occur on all 144,000 acres. These are acres under alternative D that are identified as suitable for commercial timber sale. Under Alternative D of the Draft RMP/EIS, a slight increase of actual logging would be expected over current levels. The Proposed RMP/Final EIS includes, in Chapter 2 and 4, an estimate of anticipated actual harvest per year, by alternative.
0341-14	There is enough inventory on private lands to support the timber industry. Public lands should not be offered if there are sufficient resources available on private lands. This should not be construed as to prevent prescription use of beetle kill timber, or the use	Alternatives C and D of the Draft RMP/EIS emphasize forestry objectives for enhancing wildlife habitat and fuels reduction as well as providing for public use firewood gathering. See pages 116-117 of the Draft.

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	of controlled burns to maintain ecosystem function.	
0376-4	Chitina supports the use of cooperative agreements to reduce hazardous fuels and improve wildlife habitat on Native selected lands for the issue of personal firewood gathering permits.	Thank you for your comment. The Draft RMP/EIS proposes this as a management option in Alternative D (the preferred alternative). BLM is currently in the process of signing a cooperative agreement with Chitina Corporation and this is an issue that can be worked on through that agreement.

6. LEASABLE AND LOCATABLE MINERALS

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GENERAL MINERALS		
0044-21	No new open pit mines or other non-reversible development should be allowed until more data has been collected. Postponing that development will avoid conflicts with other human uses not yet inventoried completely.	Thank you for your comment. At the onset of any large scale mining operation, an Environmental Impact Statement would be prepared. This process would allow for the complete inventory of uses and impacts associated with the activity as well as identify and mitigate conflicts. This RMP will make decisions regarding what areas would be open for such activities and under what general conditions.
0044-25	Many critical elements of BLM's National Environmental Policy Act Handbook (p. 363-4) cannot be addressed because of lack of data regarding the planning area. In my opinion, no new development or exploration should be allowed until appropriate data is available.	Where critical elements occur on BLM-managed lands in the planning area, they are addressed in the Draft RMP/EIS. This includes air quality, cultural resources, floodplains, T & E species, hazardous wastes, water quality, wetlands/riparian zones, and wild and scenic rivers. For all of these topics, there are discussions on existing conditions in Chapter 3 and environmental effects in Chapter 4 of the Draft RMP/EIS. BLM feels that sufficient data is available on all these elements to proceed with analysis and decision making.
0084-3	I strongly oppose the proposal to increase the amount of public lands open to oil and gas leasing and mining by nearly 80%, as outlined in your preferred alternative. The BLM must take a more balanced approach to managing these lands for the multiple use enjoyment of the American public, and not just for the extractive industries.	As shown on Page 517 of the Draft RMP/EIS, Alternative A proposes 61% of the land closed to leasing and 70% closed to mineral entry. Alternative C proposes 41% closed to oil and gas with 53% closed to mineral entry. So, alternatives to the preferred alternative (D) ARE considered that would open less land to potential mineral development. In addition, please see response 0305-1 regarding mineral development on selected lands.
0305-1	I oppose as well the plan to increase the amount of public lands open to oil and gas leasing and mining by nearly 80%, as outlined in your preferred alternative. I find this shocking and disturbing -- I ask the BLM to PLEASE adopt a balanced approach in its land management , taking into consideration their recreational use and enjoyment by the American public, not just as a resource to be exploited by the oil and gas industries. In addition, as a	Please keep in mind that under the Preferred Alternative (Alternative D), most of the lands identified as open to mineral development are either State or Native selected (only about 16% [937,000] of all identified lands available to leasing would actually be open due to segregation). This means, because of a segregation against mineral leasing or mineral entry, that no mineral development could take place on these selected lands until the lands are conveyed. At that time, it is up to the selecting entity to decide whether or not to allow mineral development. If any of these selections were relinquished and the lands retained in long term federal ownership, then decisions considered in this RMP regarding mineral development would become effective, including protective measures as well as Required Operating Procedures and stipulations identified in Appendix C.

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	wildlife rehabilitator and an avid observer of nature, I despair for the loss of habitat and for the many other species that man is driving to extinction. … With natural resources diminishing all over the globe, each decision needs to be carefully weighed and considered.	
0312-99	The analysis of environmental impacts connected with Leasable and Locatable Minerals (Issue #6) in the four alternatives is patently inadequate. Most fundamentally, the Environmental Consequences chapter of the EIS fails to identify any environmental impacts whatsoever from the various levels of new leasing and mineral development that would occur under the four alternatives. See EIS pages 517-521. Instead, the analysis of Issue #6 under each alternative focuses entirely on the reduced access to mineral resources that would occur where lands remain closed to mineral entry.	We disagree. Environmental consequences of anticipated mineral exploration and development under each alternative are discussed in Chapter 4 of the Draft RMP/EIS, specifically pp. 380, 383, 387, 388, 392, 396, 397, etc. This level of analysis is repeated for each resource potentially impacted by mineral development (soils, air quality, wildlife, fisheries, etc).
0331-22	We support strong protection of renewable resources and other values from oil and gas development impacts. There should be a thorough and meaningful public process regarding any proposed oil and gas development.	Any oil and gas development proposed on BLM lands will have to undergo NEPA analysis which involves public participation. In addition, measures for resource protection are summarized in the tables in Appendices I and II of the Draft RMP/EIS as well as the Required Operating Procedures described in Appendix III
0338-2	Where mining is permitted, BLM should have plenty of resources to monitor the mining to be sure the area is not polluted . The land should be reclaimed to the way it was found when mining is over.	Glennallen Field Office does have a Geologist who monitors all active mining claims and operations on BLM lands, see page 338 of the Draft RMP/EIS. See ROP-Soils-a, ROP-Water-b, and ROP-Veg-a for rehabilitation and reclamation requirements as well as those outlined in the Plan of Operations for each individual mineral project.
0354-16	To protect natural resources, there can be no development. The Native community historically does not promote development, so ALTERNATIVE A is preferred. We want all lands in the Mentasta area closed to mineral leasing (p. 137-147, maps 18-23), particularly if ANCSA (d)(1) withdrawals are revoked.	Minimal development is anticipated under Alternatives A and C of the Draft RMP/EIS. Alternative A does not allow for any mineral leasing in the areas around Mentasta. See Map 17 of the Draft RMP/EIS. All BLM-managed lands in the Mentasta area are State or Native selected. This means, because of a segregation against mineral leasing or mineral entry, that no mineral development could take place until the lands are conveyed. At that time, it is up to the selecting entity to decide whether or not to allow mineral development. If any of these selections were relinquished and the lands

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		retained in long term federal ownership, then decisions considered in this RMP regarding mineral development would become effective.
0355-8	The EARMP should include a bibliography of all known minerals and mining reports for the planning area. Such information is available in electronic form from USGS and the State DGGS.	Because of the easily accessible nature of the information and in an effort to keep the document as clean and concise as possible, that information is not included in the Draft or Final EIS. Many of those reports and biographical information are included in the Management Situation Analysis for minerals as well as the Reasonable Foreseeable Development Scenario that are on file at the Glennallen Field Office.
0355-29	Under Alternative B (page 126) and Alternative D (page 128) for Leasable Minerals (oil and gas), a provision should be included to allow leasing of areas that are otherwise closed for directional drilling when the drill is adjacent to but not within the closed area.	Areas closed to mineral leasing include sub-surface minerals. So, directional drilling to extract sub-surface resources in a closed area would not be permitted.
0355-33	In the section on Locatable Minerals (page 335) a section should be added discussing the major exploration projects and associated potential that exists in the EARMP. In the Denali Block alone and area of 271 square miles is now covered by State and Federal mining claims. This is of huge importance to the EARMP and the future of the State of Alaska.	The existing Federal mining claims are described on page 338 of the Draft RMP/EIS. Mineral occurrence and potential for locatable minerals is discussed on pp. 335-337. The current major exploration projects within the planning area are on State or Native lands and are therefore not considered within BLM alternatives.
0355-35	The discussion of Resource Allocation (page 337) is not correct. The statement is made that the staking of new mining claims would cloud the title of State or Native selections. This is not correct. All State and Native selections are already withdrawan from mineral entry and new mining claims cannot be staked on such lands.	BLM stands by this statement. The first sentence of the paragraph states "Segregations occur on State and Native-selected lands." The paragraph then explains why.
0355-36	A statement on page 338 implies that BLM's management of mining claims is minimal. This should be changed to read that it is " … minimal until such time as the claimant wishes to do some activity that will disturb the surface, at which time various laws and regulations must be followed before such disturbance is allowed."	This change has been made in the Proposed RMP/Final EIS.

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GEOLOGY		
0143-1	Given the high degree of geological activity in the region, it is reckless to open these areas for drilling and mining. There are substantial risks of fracturing earth and ice masses. They include, but are not limited to, increase in temperature and danger of earthquake and/or volcanic activity causing collapses of pipe lines.	It is precisely those geological activities that make areas productive for mineral exploration and development. It is the responsibility of the mining companies to ensure the safety of their workers and to adhere to the ROPs and Stips (see Appendix C) to protect environmental resources.
MINERALS OCCURRENCE & POTENTIAL		
0312-101	BLM has foreclosed that argument by acknowledging its assumptions that oil and gas development will occur, see EIS at 372, that small placer mines will likely be developed within the planning area, see id., that development of nickel and platinum group elements (PGE) could occur, see id. at 372-373, and that demand for gravel will increase over the life of the plan to support road maintenance and construction, see id. at 373. Since the RMP/EIS assumes that these various forms of mineral development will, or will likely, occur within the planning area during the life of the plan, the EIS must analyze the potential environmental impacts of that projected mineral development.	We do. See all sub-headings "Impacts to…from Mineral Exploration and Development" for each resource (air quality, soils, vegetation, wildlife, fisheries, etc.) in Chapter 4 of the Draft RMP/EIS.
0312-103	The analysis of Leasable and Locatable Minerals is flawed in several other respects as well. The goal identified for Issue #6 is far too narrow and fails to give adequate weight to the protection of sensitive resources on BLM lands. The goal as articulated emphasizes the facilitation of increased resource development with a passing nod to protection of environmental values. See EIS at 122 (“Maintain or enhance opportunities for mineral exploration and development while maintaining other resource values”). BLM’s land management mandate, however, extends far	BLM recognizes it's duties to protect other resources, as stated in goals for other resource areas (recreation, soils, air, water, vegetation, wildlife, cultural resources, etc, pp. 55-86, Draft RMP/EIS). These goals are not mutually exclusive, BLM believes that resource development is possible while providing protection and maintenance of other resource values. The Draft RMP/EIS also considers potential impacts to resource values from mineral exploration and development and considers a range of different management alternatives with varying degrees of resource protection.

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	beyond resource development. BLM has a duty to protect the sensitive biological resources on its lands and to safeguard the public trust in those resources. Thus, the goal for Issue #6 should be revised to place a greater emphasis on protecting sensitive resources such as water quality, air quality, wildlife habitat, subsistence resources, and wilderness values.	
0312-105	The EIS states that BLM will continue to "provide detailed mineral assessment of specific areas." See EIS at 122. BLM should provide a citation for the source of its authority to conduct this assessment.	Authority for these assessments is provided by Section 1010 of ANILCA. This information has been added on page 137 of the Proposed RMP/Final EIS.
0312-107	Revisions to the 1872 Mining Law are necessary before the BLM proceeds with opening up public lands to mineral entry. In the meantime, The BLM should identify area wide terms, conditions, or special considerations needed to protect resource values.8 Guidelines for rehabilitation and re-vegetation should be identified in open areas to minimize noxious weed or non-native plant introduction.	The Preferred Alternative of the Draft RMP/EIS does identify area-wide terms, conditions, or special considerations needed to protect resource values (see tables, Appendix I, Alternative D column). It also establishes Required Operating Procedures to minimize noxious weed introduction in reclamation efforts (see Appendix III).
0319-2	I am strongly opposed to mining and exploration, particularly in the Tangle Lakes area. This archeological area is highly used by Alaskans for recreation of many types. Mining destroys habitat and depletes fish, birds and game, leaves visual scars and pollution ... ruins existing roads while tearing up the land for more roads, is noisy and dusty while occurring , and has a history of minimal societal benefit while leaving permanent scars.	Thanks for your comment. Alternative C would maintain a closure on mineral entry in the Denali Highway area. Please keep in mind that management prescribed in this RMP only affects BLM-managed lands, not State lands, where the current focus on mining development is north of the Denali Highway on State land.
0321-8	The 78% increase in oil and gas leasing is too aggressive, we cannot support the opening of 79% of the entire management area for leasing.	Thanks for the comment. Alternatives A and C of the Draft RMP/EIS consider management scenarios under which less land would be open to leasing. The increase also includes acreage of selected lands, which are segregated to mineral entry. See response to comment 0305-1.
0329-98	Why leave coal leasing decisions off for a case-by-case decision? (p.123) Please don't	Because there has been little interest in coal and it is anticipated that this will continue, based on local geology, access, and marketability. Occurrence and potential for coal is

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	lease coal. Why is there no MSA for coal? What coal resources exist in the planning area? What is their potential for development?	discussed on p 325-329 of the Draft RMP/EIS.
0329-99	How does the proposed action relate to possible development of the Bering River coalfield? The Draft EIS just says, "it is unlikely that these coal resources will be developed in the next 15-20 years." (p.325) What is the basis for that? At least in the case of the Bering river field, development in the next couple decades is reasonably foreseeable. What impact would proposed action have on that?	This assumption is based on past history of coal leasing in the planning area (one federal lease in 1984), interest from industry, and access. The preferred alternative of the Draft RMP/EIS would maintain a withdrawal on the western 2/3 of BLM-managed lands in the Bering Glacier area. This would make BLM managed lands in the vicinity of the Bering River Field closed to coal leasing.
0329-100	What is the impact of mineral exploration, as opposed to development? We are concerned that opening broad areas to mineral entry will result in a great deal of exploration, very very little of which will result in any actual economic return. This exploration will just be a cost to the land, with no economic return to society. Exploration would result in roads and trails, which can degrade habitat and have far-reaching impacts. It also can cause beetle kill when brush is not dealt with properly, disturbance to critters, and degrades wilderness values.	In most environmental effects discussions in Chapter 4 of the Draft RMP/EIS, impacts from exploration are included with the discussion of impacts from development. See Chapter 4, under sub-headings "Impacts to…from Mineral Exploration and Development." Effects from roads and trails associated with exploration are discussed as part of these analyses.
0329-102	Many of the areas proposed to be opened to mining are unreachable mountain peaks, or are buried under miles of ice. What is the point of opening these areas?	The question could easily be asked, what is the point of keeping them closed, especially when ANCSA d(1) withdrawals can be replaced with much more site-specific protective measures, driven by resource-specific concerns. ANCSA d(1) withdrawals were never intended to be used as a long-term protective measure. The intent of the withdrawals was to limit appropriation of the lands in order to complete inventories of resources and assessment of values to allow for an orderly development of the BLM's management objectives (p. 291, Draft RMP/EIS). This planning process is the means by which that is accomplished.
0329-103	What is the basis for a 200-foot setback for oil & gas rigs from anadromous streams under alternative C? Why not 400 feet? Why not ten feet?	200 feet is the distance used by the State (DNR) in their Copper Basin Area Plan for closure to mineral entry around anadromous streams and rivers.
0329-105	We are concerned about the MAN project, by	The areas where the MAN claims are located and where the most intensive exploration

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	Nevada Star and others. According to the Draft EIS, development of this mine would roughly follow the pattern of the Pogo mine near Delta. Such a venture, with on the order of 800-1,600 acres of surface disturbance (BLM 2004, Mineral Occurrence and Development Potential Report), could be disastrous to the wildland values of this area.	efforts have been focused have been conveyed to the State of Alaska. If development occurs on these lands, BLM is prepared to field requests for access across BLM-managed lands, based on decisions made in this planning effort.
0329-106	The Draft EIS fails to disclose any logic to why the minerals alternatives are written the way they are. Why are there no recommendations from the Minerals Potential report? Where did the positions come from?	The Mineral Occurrence Report is not intended to give recommendations for opening lands to mineral exploration and development. Its primary purpose is to identify areas of High, Moderate, Low and No Mineral Potential regardless of land ownership. The Mineral Occurrence and Development Potential Report (2004) was used extensively for much of the information presented in Chapter 3 of the Draft RMP/EIS. It was also used to help make decisions regarding alternative considerations for opening or closing specific areas to locatable mineral entry. Whether an area is considered as open or closed to mineral entry or mineral leasing in this process is not necessarily dependent on its' mineral potential. In other words, just because an area is open doesn't necessarily mean that it has high potential (geologically) for mineral development. More often, determinations were reached and alternatives developed based on what levels of resource protection were needed, given the resource values present in a particular area.
0329-110	Why aren't there any alternative ways to deal with Coalbed Methane? This type of drilling poses unique issues, that ought to be dealt with in the RMP. Current regulations are plainly not up the task. Current state policy is the adopt regulations for this area, only after development is under way. BLM should take the lead on this issue. It will be much easier to do this now, rather than later, under pressure from an application and upset interest groups. CBM would not be appropriate on most of the wetland country in the area. Those areas should be made off limits to CBM development. Please require specific operating plans, and protect surface owner interests from split estates.	The lack of alternatives for coalbed methane is based on the following statement (p. 330 Draft RMP/EIS): "However, we know of no companies testing lignite coal for gas, and with present technology it is unlikely that industry will produce commercial amounts of gas from lignite coal within Alaska for the reasonably foreseeable future." This assumption is carried through into Chapter 4 (p. 371). Additionally, coal on BLM lands is either too remote or doesn't meet the requirements to be a Coalbed Methane prospect.
0329-111	How can geophysical work be considered in sensitive wetlands during the summer?	Please see the Required Operating Procedures on page 619 of the Draft RMP/EIS.

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	Summer geophysical work has huge environmental impacts.	
0329-115	Please consider the well currently drilled by Rutter & Wilbanks west of Glennallen, along the highway. Also, consider the gasline Right-of-Way application currently being reviewed by the state. These are critical considerations in regards to cumulative impacts.	Current findings from the Rutter and Wilbanks well are consistent with assumptions made in the RFD. Also, the RFD assumes 120 miles of pipeline construction necessary if oil and gas development occurred in the area. These factors are already considered in the analysis in the Draft RMP/EIS.
0329-116	What level of confidence do you have in the RFD scenario? What is the margin of error?	The RFD was prepared using the best up-to-date information available. As stated in the RFD, "Estimating how much oil and gas activity will occur in the GFOA during the next 15 years is difficult at best. Timing and location of future commercial-sized discoveries cannot be predicted until exploration of those reserves occurs." Given the geology of the area, results of recent exploration, and the amount of selected land in the planning area, it is more likely that the RFD over-estimates development levels than underestimates them. However, analyzing impacts that could occur and measures to mitigate them, as is done in the Draft RMP/EIS, is better than not addressing the possibility of development.
0329-117	The Draft EIS is incorrect that if an exploratory well were plugged and abandoned, "drilling muds and cuttings would be re-injected into the bore hole." (p.469) Re-injection only works given larger fields of more than one well. Wildcat exploratory wells typically still use reserve pits—a technique that has been refined little in the last many decades. The current well near Glennallen, in fact, has a reserve pit.	The effects analysis was based on the following, from the Reasonably Foreseeable Development Scenario prepared for this planning effort: "The BLM (as well as the State) discourages the use of reserve pits and most operators now store drilling solids and fluids in tanks, or in temporary on-pad storage areas until they can be hauled out or injected down the annulus of the well in accordance with State of Alaska statute. A permit is required by the State for onsite disposal or storage of drill cuttings." The current well you refer to near Glennallen is located on Ahtna land.
0329-121	The Draft EIS (p.448) ignores the fact that exploration wells are commonly abandoned, and are never reclaimed. For example, the old Katalla drillsite has been sitting there leaking oil into salmon streams for decades, without any cleanup.	The Draft EIS makes this assumption because, on BLM lands, abandoned exploration wells are reclaimed. The example you cite from Katalla which is not on BLM-managed lands.
0329-122	The Draft EIS does not appreciate that oil toxicity is persistent. (p.417) For example, the Draft EIS says: "The impacts of gravel pads are considered permanent, while those of oil spills, which are cleaned up immediately, allow recovery within a few years to two decades.	Persistence of oil in the environment might be debatable, depending on which research is cited. However, BLM does consider the effect of spills in the Draft RMP/EIS and applies Required Operating Procedures to minimize the potential for such spills. Analysis of environmental consequences has to take into account anticipated level of development as well as intensity. This is what the effects determinations in Chapter 4 are based on, as explained on p. 361 of the Draft RMP/EIS.

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	Most oil spills occur on gravel or ice pads, and consequently, their effects do not reach the vegetation. Overall, past spills on Alaska's terrestrial habitats have caused minor ecological damage, and ecosystems have shown a good potential for recovery, with wetter areas recovering more quickly."(p.429) Newer and better evidence is clearly indicating that your sited studies are old and obsolete, and that toxic impacts of oil spills are very persistent. (Ott 2005, Peterson et al. 2003)	
0329-123	Drilling setbacks of 500 feet don't seem like they'll prevent impacts from thermokarsting. (p.416)	If soils in a particular area are particularly susceptible to thermokarsting, then the ROPs and stipulations allow for adjusting the buffer distance through a site-specific NEPA analysis. All proposed drilling locations are subject to approval by the BLM.
0329-124	We are concerned that "lakes and riverine pools could be subject to dewatering if consumptive use is high," especially during winter. (p.417) Oil & gas drilling, and mining both use huge amounts of water, and dewatering impacts are likely. How much water does each well use?	Drilling operations can use from 10,000 - 35,000 gallons of water per day. Effects of oil and gas development on water quality and fish and fish habitat is described in Chapter IV of the Draft RMP/EIS.
0329-125	Winter-only drilling is not an effective mitigation measure, especially with climate change. The current well is a winter-only one, and it is July. These sorts of seasonal restrictions are very difficult to work in an unpredictable, tight-lipped exploration industry like oil.	Winter only drilling is not proposed as a Required Operating Procedure or stipulation in the Draft RMP/EIS. Because of timing restrictions associated with trumpeter swan nesting or other stipulations, winter operations might be the only feasible option in some locations.
AREAS PROPOSED AS OPEN, LIMITED, OR CLOSED TO MINERALS		
0017-1	Alternative D is opening up millions of acres that have been closed, proposing to open those, and I think that would also cause significant impact -- it could cause significant impact to subsistence as well. Concerns that my organization has are impacts to the ecology of the area, which goes hand-in-hand with subsistence but damage to the Copper River watershed by increased mining, both oil and gas and hard rock mining. And if you take a	The environmental effects of implementing Alternative D, under an anticipated level of development, are described in Chapter 4 of the Draft RMP/EIS, including potential impacts to fisheries and to subsistence. See pages 476, 471 for fisheries and pages 533 for subsistence.

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	look at kind of the cumulative impacts of this area, there's already a platinum mine being proposed to go in up by Tangle Lakes.	
0034-4	[I]n the plan they're talking about opening up the Alphabet Hills for development and that's where our caribou migration path is. It is just too vital of an area to open up for development.	The preferred alternative (D) would recommend revocation of an existing withdrawal (PLO 6329). The revocation of this withdrawal would have no immediate effect on the Alphabet Hills, which is State or Native or dual selected. Selected lands have a segregation against mineral entry. Consequently, no mineral entry could occur on these lands until they are conveyed to the selecting entity, at which time it is their choice on whether or not mineral development occurs. The only way this decision (to remove the withdrawal) would have an effect would be if the selections were relinquished and the lands were retained in long term federal ownership.
0060-1	One is the issue of oil and gas and mineral openings. There has been, under the preferred Alternative D, a drastic increase in the percentage of the land that would be available for these openings. And while I realize that this is in part because so much of the land is slated to be withdrawn as Native selected or State selected land, I would stress the importance of BLM setting a precedent for land management and for approaching this management process as much as possible as if all of the lands were truly, you know, contiguous and going to be managed as a parcel long-term. Simply because, I think, part of the purpose of this planning process is to create patterns of use and set precedence for patterns of use, otherwise the planning process wouldn't be occurring at all, and to set an example for how the lands should be managed.	Please see response to comment 0060-10.
0060-6	We recommended that for the planning of Leasable Minerals, Oil, and Gas that the BLM follow Alternative C. Alterative C is the most restrictive to mineral development and may be presumed is the best alterative to ensuring the ecological balance of the Interior. As this is the first plan in twenty years, adhering to an approach that is both cautionary and	Thanks for the comment. Alternative D (the preferred) of the Draft RMP/EIS opens more lands to mineral entry or mineral leasing, through revocation of ANCSA d(1) withdrawals. This does not necessarily mean that development will occur on these lands.

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	conservative is necessary. Under Alterative C, the highest percentage of acreage possible ...remains protected from entry through closures or No Surface Occupancy.	
0060-9	In the planning of Locatable Minerals it is recommend that the BLM proceed with Alternative A. In regards to the planning of Locatable Minerals, the BLM has not enacted a viable land management plan in east Alaska since the 1980's. Given the changing climate of development, politics, and the needs of Alaska it is recommended that the BLM proceed with great caution.	Thanks for the comment. We recognize that the Management Framework Plan adopted in 1980 is out-dated, driving the need for this planning effort.
0060-10	BLM's preferred option is unacceptable. The closing of only 15% [to mineral development] (1,068,000 acres) and ensuring accessibility to 85% (5,988,000 acres) would expose too much ecological diversity to the potential threat from a mining operation.	Opening 85% of the BLM-managed lands to mineral entry does not mean that development will occur on 85% of the land. Nor does it mean that accessibility is ensured. Assuming alternative D is adopted in the Final RMP, future development would be contingent on several factors: 1) If the land is State or Native selected, the land would either have to be conveyed (in which case the selecting entity chooses whether or not to allow mineral development) or the selection relinquished and the land retained in long-term federal ownership; 2) the area must have mineral potential enough to warrant development, which is an expensive proposition; 3) other factors such as access, topographic features, and existing infrastructure would need to be favorable. These factors were considered in anticipating levels of development for the analysis that was done in Chapter 4 of the Draft RMP/EIS.
0067-1	If we start closing things off so we cannot use them or we start closing mining it's going to hurt the people that live here.	Thanks for the comment. Economic impacts of implementing different management alternatives are discussed starting on page 522 of the Draft RMP/EIS.
0097-10	Alternative C would open up 59% and 47%, respectively [to oil and gas leasing and mineral entry]. Since so many of these lands are selected, and will upon conveyance be opened for exploration and development, we believe there is no need for BLM to open up the lands it retains. We support Alternative C for this reason. In turn, retaining the d(1) withdrawals affords more opportunities for recreational access.	Thanks for the comment, although we don't agree with your conclusion that retaining the ANCSA d(1) withdrawals would afford more opportunities for recreational access.
0147-1	We support the proposal to increase the	Thanks for the comment.

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	amount of public lands open to oil and gas leasing and mining by nearly 80%, as outlined in one of your alternatives. The BLM must take a more balanced approach to managing these lands for the multiple use enjoyment of the American public.	
0184-1	My biggest concern with the Plan is the the [sic] potential opening of lands to mineral exploration. It seems to me, opening lands to mineral exploration would be in direct conflict with every other recreational and subsistence use of the lands. Please keep mineral exploration restrictions in place.	See Chapter 4 of the Draft RMP/EIS for a detailed analysis of the environmental effects of anticipated mineral development, by alternative. In addition, see response 0060-10.
0312-98	Lands recognized for outstanding resource values should not be considered for leasable or locatable mineral entry: • All portions of Wild and Scenic River corridors should be closed to leasing, exploration, and development • All lands within proposed RNA, ACECs and SRMAs • Lands within 400 feet of anadromous rivers and streams • VRM classes I and II in the entire planning area • Primary trumpeter swan breeding habitat not included in an ACEC • Critical moose winter range • Areas within ¼ mile of historically active bald eagle and osprey nest sites • Lands adjacent to communities and residential areas As we have stated elsewhere in this document, the lands within the viewshed of the Glenn, Richardson, and Denali Highways should remain closed to mineral withdrawal on BLM administered lands.	All your suggestions are considered in Alternative C, some in Alternative D of the Draft RMP/EIS.
0329-97	We are adamantly opposed to the drastic increase in mining proposed in the Draft EIS/RMP. The Draft proposal is, basically, to lift as many restrictions to mining as possible, as soon as possible. This is an extremist vision that we find disturbing. Alternative C only maintains withdrawals on	Please see response to comment 0329-104.

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	about 50% of BLM land, opening the rest to exploitation. It stretches good sense to propose OPENING millions of acres to development, and call it "conservation." Clearly there has been some misunderstanding about the meaning of "conservation." We would support the opposite approach—that is, maintain all mineral withdrawals, and maybe consider recommending some new ones. There is plenty of land available for mining already. What is left has little potential, and could only be developed at great expense to operators and the environment. At the same time, we also support limited grizzled prospector habitat. It is a way of life and we don't want to deny people that opportunity. It is reasonable for small businesses to work some of the gold placer deposits, for example, where that doesn't conflict with fish or wildlife.	
0329-101	The Draft EIS doesn't do a very good job explaining what impact these decisions regarding minerals will have, on the ground. For example, do the RMP decisions have any bearing on the amount of placer gold operations? If these lands are closed, will the same miners just go somewhere else? Or, if they are opened, will more mining take place in the state? Or, will existing miners move to BLM land, and off private or state land?	Assumptions for anticipated level of mineral development in the Draft RMP/EIS for each alternative are based on the Mineral Occurrence and Development Potential Report prepared as part of the planning process. Assumptions used in the analysis for locatable mineral development are explained on pp. 372 and 373 and under "Impacts by Alternative" starting on p. 375. See, for example, the discussion of impacts to recreation from locatable minerals (under "Locatable Minerals") on page 388.
0329-104	Why would maintaining withdrawals on 50% "severely limit development?" (p.406) Please describe the basis for this statement.	Sure. For example, under alternative C for leasable minerals, 41% of the area would be closed to leasing. In addition, 33% of the area would be open to leasing, but subject to No Surface Occupancy due to resource constraints (page 130, Draft RMP/EIS). This essentially severely limits 75% of the BLM-managed lands in the planning area to mineral leasing.
0329-107	How can increasing the amount of drilling and exploration be considered "conservation?" ...	Please see response to comment 0329-104. Alternative C of the Draft RMP/EIS places a strong emphasis on resource conservation by severely limiting 75% of the BLM-managed lands to mineral leasing.
0329-108	Exploration, drilling, transportation and	Thanks for the comment. Actually, alternatives B, C, and D establish a 500 foot buffer

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	consumption of fossil fuels hurt fish. That is reason enough to maintain these closures. Wetland areas, and salmon spawning habitat, should be strictly off limits to oil & gas.	(no oil and gas drilling or facilities) around all fish bearing streams, rivers, and lakes (see Required Operating Procedures, Appendix III of the Draft RMP/EIS).
0329-112	Why are 1,819,000 acres wide open to leasing even under the Conservation alternative? Another 2,322,000 would be open subject to some constraints. It would be a reasonable alternative to keep all the land closed to entry. Why not even consider it?	See response to comment 0329-104.
0329-113	It is hard to tell what areas are open and closed under the various alternatives in the Bering glacier area. The eastern two-thirds, and eastern third are proposed to be open in different alternatives, but that's not reflected on the map.	This will be shown on a map in the Proposed RMP/Final EIS. Thanks for the comment.
0329-114	It is impossible to tell which areas would be open under the different terms and conditions. It isn't shown on any map or described in the text. Please include this information in the Revised Draft EIS/RMP.	Maps 18-23 of the Draft RMP/EIS show areas open to mineral leasing and mineral entry by alternative. Short narrative in the tables on pp. 130-134 describe areas under the different terms and conditions of leasing. Because of the overlapping nature of some of the seasonal and minor leasing stipulations (moose winter range, trumpeter swan habitat, etc) portraying these together on a map is very hard and very confusing to the reviewer. Maps 19-26 of the Proposed RMP/Final EIS have been modified to clarify presentation of this information.
0331-21	We support the strongest proposed closures and restrictions on locatable mineral entry. Lands that are being mined or have been mined too often lose their value for other uses. Mining laws, regulations and enforcement have thus far proven a failure in protecting air quality, water quality, wildlife habitats and visual resources. Until that changes, good stewardship requires that quality lands be off-limits to mining and mineral exploration.	Alternative C of the Draft RMP/EIS imposes the greatest restrictions on mineral development. We disagree with your assessment. We feel that mineral development can be conducted with protection provided for other resource values.
0335-1	I'm primarily a non-motorized user of the Tangle lakes, Gulkana, Delta River and Copper River (also Nizina and Chitina Rivers). I feel very strongly that these areas should be closed to mineral exploration and development. They	Thanks for the comment. Alternatives C and D of the Draft RMP/EIS would maintain closures against mineral entry and mineral leasing in the Delta and Gulkana Wild and Scenic River corridors (includes the Tangle Lakes area). Alternative C would maintain a closure against mineral entry and leasing along the Denali Highway.

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	are our easily road accessible treasures, open to the common person w.o. having to fly in, to fish, hunt, hike, snowshoe and ski. Please protect these lands for future generations. The idea of some Fort Knox-sized open pit mine in the Delta R. area is a total nightmare. IT would completely destroy the wilderness values that make the land so important and valuable, now and forever.	
0346-1	Having said that, I oppose Alternative D for Eastern Alaska. I disagree that a nearly 80% increase in areas open to mineral, oil, and gas leasing is "balanced."	Please see response to comment 0060-10.
0355-1	New Approach Needed: It is not necessary to close lands to mineral entry in order to establish areas where there can be a focus on recreation. Trails and remote cabin sites can be established without closing huge areas to mineral entry. Rather than closing areas to establish SRMAs, [sic] we recommend that 5 or 10 acre sites be defined in areas that are not mineralized. These areas could be established for the cabin sites, with the requirement in the plan that, should the area be affected by mining in the future, the mining company would be responsible for relocating the cabins. The majority of the land can remain open and available. If a valuable mineral deposit is identified, that deposit can afford to pay for relocation of the cabin. Large areas of mineral closures do not just affect he immediate area but rather they will typically render the whole vicinity unattractive for mineral exploration. Mineral companies have been burned so badly and so often by closures, special use areas, etc. that they are not likely to ever consider an area with large closures.	The Preferred Alternative (Alternative D) would only close 15% of BLM-managed lands to locatable mineral entry. And, areas are not necessarily closed to mineral entry because SRMAs are established. In the preferred alternative, mineral entry would be permitted within portions of the Denali, Delta Range, and Tiekel SRMAs, unless prohibited by existing PLOs (such as the inner corridor of the pipeline/utility corridor). Your suggestion is considered under Alternative B, which opens all areas (except the wild portions of the Wild and Scenic River corridors) to mineral entry.

7. SUBSISTENCE/SOCIAL AND ECONOMIC CONDITIONS

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GENERAL SUBSISTENCE AND SOCIAL AND ECONOMIC CONDITIONS		
0341-3	Salmon fishing is the keystone to the regional sustainable economy. Copper River Salmon are the measure of wealth and the key to survival for the indigenous people of the region. Although separated by mountains and glaciers, the Ahtna and Eyak have always shared the salmon of the river system. Subsistence is a major factor in the economy. Each year on the lower river Cordova/Eyak residents harvest about 175 pounds of subsistence food per person. In the upper basin, residents harvest about 340 lbs. Copper River salmon are the most important component in the subsistence economy. On the commercial fishing front, "Copper River Salmon" have become a recognized brand, commanding a premium price in the market. Annually, about 1.5 million salmon are harvested at the mouth of the Copper River by the commercial fishing fleet, with an ex-vessel value of $20 million. Cannery workers, plant operations, tenders, and product transportation contribute an additional $20 million. Upriver fishermen harvest on the order of 200,000 salmon. Various economic formulas place sport-fishing value between $2 and $5 million, and subsistence and personal use value in excess of $1.5 million. Conservative estimates place the economic value of fisheries related business in the region at between $ 40million and $45million annually, the largest economy and employer in the watershed. (Additional cited information on economics available by request)	Thank you for the comment. A short summary of this information has been added to Chapter 3 of the Proposed RMP/Final EIS (page 376).

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SUBSISTENCE, ANILCA SECTION 810 ANALYSIS		
0033-4	Subsistence; I'll wrap it up in a few a sentences. Subsistence is not about killing game or hunting, it's about sharing of resources and it's about management of those resources in a way that constitutes the wellness of the community that the resources are located at. So we don't want to have a plan that promotes killing game, and basically that's what yours does, that's not acceptable. Let's not talk about shooting things. Let's talk about putting food on the table. That's what subsistence is all about and what it should remain to be.	Thank you for your comment. Additional language has been added to the description of subsistence user patterns in Chapter 3 of the Proposed RMP/Final EIS (page 376) to emphasize sharing as a central cultural value in the subsistence way of life. The Section 810 analysis will focus, as provided in the statute, on the potential for land management decisions to significantly restrict subsistence uses, including subsistence harvests.
0044-17	Native traditional berry picking is practiced on the flats within two miles of either side of the Susitna River bridge. Development of that area should protect the quality of those subsistence areas.	Thanks for the comment. Information has been added to Chapter 3 of the Proposed RMP/Final EIS (page 373) that discusses subsistence use patterns in the planning area.
0080-6	Further be it resolved, the Southcentral Regional Council recommends that BLM encourage cooperative agreements (or memoranda or understanding) with local tribal entities and land owners to resolve land management issues, and to improve/protect habitat through actions such as prescribed burning.	Through this planning process, the BLM, Glennallen Field Office has entered into MOUs with Ahtna, Inc., Tazlina Village, Cheesh'Na, and Chitina. The purpose of these MOUs is to encourage and facilitate open communication in implementation of this RMP.
0080-9	Finally, be it resolved, the Southcentral Regional Council recommends BLM carefully examine the requirements of ANILCA Section 810 to protect subsistence uses in developing the final plan, particularly the determinations required when an action has the potential to significantly restrict subsistence uses.	These required determinations have been fully examined in the final Section 810 analysis, Appendix E of the Proposed RMP/Final EIS.
0164-56	Subsistence uses should have a higher priority than resource development.	The provisions of Title VIII of ANILCA ensure that subsistence uses receive a priority in allocations in comparison to other consumptive uses, such as commercial and recreational harvests. However, the statute does not provide a priority for subsistence resources and subsistence uses in relation to land use decisions concerning resource

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		development. Section 810 requires a specific analysis of potential impacts to subsistence uses. If the proposed land use decision “may significantly restrict” subsistence uses, then the manager must provide notice and conduct a hearing in the affected region. Following the hearing, the manager may proceed with the proposed use, even if it might restrict subsistence uses, provided that the manager determines that the proposed activity is necessary under the agency mandate, will effect a minimum of public land, and is accompanied by appropriate mitigation measures.
0164-57	Page 150 - under D) Alternative B second paragraph, the percent of moose harvest provided by hunting in the transportation and utility corridor should be included.	This change has been made in the Proposed RMP/Final EIS.
0164-58	Page 152 - At the conclusion of the description of the alternative for Subsistence Issue, there is no table presenting the "Alternative Summary" as was done for the other six issue. Ahtna Inc. requests that this table be created and included in the Final EARMP.	This change has been made in the Proposed RMP/Final EIS (page 169).
0164-59	Page 341 - The first two paragraphs as a way of introducing the complex environment of Subsistence can be general to present an overview, but the third paragraph is unnecessarily vague. There is data for most of the communities in the planning area that would provide specifics to the Copper Basin household harvest and use of fish and wildlife and also sharing of subsistence resources. This information would seem more relevant to the description of the "Affected Environment" than most rural families in the Alaska. Ahtna Inc. requests that this information be researched and included in the Final EARMP	A more complete and specific description of subsistence use patterns in the planning area communities is required and has been added to the Proposed RMP/Final EIS (starting on page 373).
0164-60	Page 342 - Under b) Current Program Administration, since the concept of customary and traditional use determinations was defined in a) on page 341; it would be helpful to list the communities that have customary and traditional use determinations fort he species identified as important subsistence resources,	The change has been made in the Proposed RMP/Final EIS by referencing the Federal subsistence regulations.

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	caribou (p206), moose (p208), and salmon (p248). Ahtna Inc. requests that this information be presented in the Final EARMP.	
0164-61	Page 526 - The first fill paragraph on this page contains an inaccuracy … Possibly the statement would be correct if it read: "State management on the non-Federal lands had reduced non-resident hunting . . ." This section would also be the appropriate place to discuss how the State Tier II system in place for the Nelchina Caribou Herd and Unit 13 does not address the subsistence needs of the residents of the Copper Basin since the State law allows priority for all residents of Alaska. Data is available to show the residency of the hunters who receive Tier II permits which would confirm the lack of priority for rural residents in the planning area. Ahtna Inc requests that this information be researched and included in the Final EARMP as it illustrates the subsistence issue more clearly.	The original sentence in the Draft RMP/EIS refers to reductions in non-local hunting under Tier II management, compared to previously, and is therefore accurate. Additional discussion of the State Tier II management systems in Unit 13, including discussion of relatively low local success in obtaining permits is warranted and included in the Proposed RMP/Final EIS.
0164-63	Page 652 - In the 5th paragraph on this page the word "may" should be "would" so that the sentence should read: "Revocation of the ANCSA d(1) withdrawals and PLO 5150 would significantly reduce the availability of game resources . . ."	We agree. The change has been made in the Proposed RMP/Final EIS.
0164-64	Page 654 - Under B.2.4. Findings, the second sentence of the second paragraph is garbled. This sentence should be edited to state correct information.	The sentence has been revised in the Proposed RMP/Final EIS (page E-10) to more clearly point out that the key impact to subsistence uses under alternative B is in the likely displacement of current Federal subsistence users by competition from other users. A second sentence will point out that alternative B is not considered likely to directly reduce key subsistence populations.
0175-43	Page 292, Transportation and Utility Corridor, First paragraph final sentence. While this sentence is technically correct, it is important to clarify that the State regulates subsistence harvests throughout Alaska unless the state regulations are superseded by federal	Language will be clarified in the Proposed RMP/Final EIS to point out that the State previously managed subsistence hunting and fishing across Alaska in compliance with Title VIII of ANILCA. After 1990, the Federal government was obliged to directly manage the Title VIII rural subsistence priority on Federal public lands. The State continues to manage State-defined subsistence and other hunting and fishing activities, including on Federal public lands, except where these are closed to non-Federally qualified

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	subsistence regulations on federal public lands. In other words, both the state and federal regulations govern subsistence harvests on federal public lands.	subsistence uses.
0175-44	Pages 341-343, Subsistence. In this chapter, we expected a description of subsistence activities in the planning area, as is suggested in the first sentence of the "How to Read This Chapter" section on page 159. However, neither this section nor the ANILCA Section 810 Analysis in Appendix V provides this important information. If discussion of the potential effects of proposed management actions and measures on subsistence uses of the affected lands will be limited to this chapter and/or the ANILCA Section 810 evaluation, then we request the Bureau fully develop this discussion in the final plan. We urge that a revised discussion include the following: (1) a description of subsistence activities currently taking place in all areas of the planning region; (2) an evaluation of the potential impacts to these activities by the proposed actions; (3) an assessment of the potential cumulative effects to subsistence resources or opportunities referenced in the Review Summary; and (4) a discussion of measures that would be taken to avoid or mitigate negative impacts. This may entail preparing a much more detailed 810 evaluation than typically accompanies land use planning documents, but will be essential to fully address the issue and inform the affected public(s).	A fuller description of subsistence use patterns in the planning area has been added in Chapter 3 of the Proposed RMP/Final EIS, starting on page 373. Concerning your remaining points, the Section 810 evaluation at this stage is only focused on the question of whether any of the proposed alternatives, including the cumulative case, "may significantly restrict subsistence uses." Having concluded in the affirmative, Section 810 requires hearings, and these were conducted in summer 2005. The final set of determinations including proposed mitigation measures, are developed following the public hearings, and appear in the complete Section 810 analysis which accompanies the Proposed RMP/Final EIS as Appendix E.
0175-45	Page 341, 2nd paragraph and page 203, 2nd paragraph. We request the discussion of "sport hunting" (second paragraph page 341 and second paragraph page 203) be corrected. The State subsistence law currently includes all	Language will be clarified in the Proposed RMP/Final EIS to point out that from 1980 – 1990 the State managed subsistence hunting and fishing across Alaska in compliance with Title VIII of ANILCA. During that era, hunting by non-rural residents was commonly referred to as "sport hunting." After 1990, the Federal government was obliged to directly manage the Title VIII rural subsistence priority on Federal public lands. The

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	residents as subsistence users in areas where subsistence uses are authorized in State regulation. Federal agencies frequently mischaracterize hunters who are not federally qualified subsistence users to be "sport hunters." Non-federally qualified subsistence users who are state residents often qualify as subsistence users under the State regulations. It is also important to clarify that State regulations classify hunters as being "resident" or "nonresident" hunters.	State continues to manage State-defined subsistence and other hunting and fishing activities, including on Federal public lands, except where these are closed to non-Federally qualified subsistence uses. Since 1990, the state no longer refers to "sport hunters", since hunting by all Alaskans is considered state-defined subsistence hunting. State regulations do distinguish between "resident" hunting for all Alaskans and "non-resident" hunting by persons from other states or nations.
0175-46	Page 342, 2nd and 3rd full paragraphs. We request that the second and third full paragraphs on page 342 indicate that State of Alaska regulations continue to apply on federal public lands, unless superseded (i.e., restricted) by federal subsistence regulations. State of Alaska regulation apply as well as on all State and private lands.	The language will be changed in the Proposed RMP/Final EIS to specify that the State formerly implemented a subsistence management program that complied with Title VIII of ANILCA, until this was overturned by the Alaska Supreme Court. Since then, the Federal Subsistence Board has directly managed the title VIII rural subsistence priority on Federal Public lands. The State manages State-defined subsistence and other hunting and fishing activities, including on Federal lands, unless these have been closed to non-Federally qualified subsistence uses.
0175-47	Page 343. Two of the bullets at the top of page 343 may overstate the Bureau's role in subsistence management. We request revising the second bullet to read, "Manage BLM land and habitat . . . ". We question whether Bureau staff actually "develops interagency subsistence management regulations and policies," as asserted in the fourth bullet, or if they instead make recommendations regarding regulations and policies for decision makers.	Language will be clarified in the Proposed RMP/Final EIS to more clearly state that the BLM participates in the inter-agency Federal subsistence program, with BLM staff advising the BLM State Director (or his delegated representative) who serves as a voting member of the rule-making Federal Subsistence Board.
0175-49	Page 373, Resource Assumptions: Subsistence. We question that the Bureau would continue to have a "major role in the management of subsistence resources on public lands" if as many as 5.5 million acres of the 7.1 million acres currently managed by the Bureau in the planning area are conveyed to the State and Native interests. Such a	We stand by our assumption. Local rural communities rely heavily on the unencumbered Federal lands, managed by the BLM for a significant portion of their overall subsistence harvests.

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	conveyance would substantially reduce the amount of Bureau lands in the planning area and would require fewer Bureau resources. We acknowledge the continuing role the Bureau will play in federal subsistence management activities generally in Alaska, whether or not a substantial portion of the Bureau lands in the planning area are conveyed to the State	
0175-60	Appendix V: ANILCA Section 810 Analysis of Subsistence Impacts. As noted above (comments from pages 341-343), neither the main text nor this appendix presents a description of subsistence uses of the planning area, which we consider an important deficiency in the plan. Enough information about subsistence uses is presented, however, to enable the Bureau to conclude " . . . at Alternative B and the cumulative case considered in this Draft RMP/EIS are likely to significantly restrict subsistence uses." To comply with required procedures in this situation, the Bureau has initiated public hearings to solicit public comment from local communities and subsistence users. We recommend that the Bureau use testimonies at these hearings to supplement what already had been documented about subsistence uses in the planning area.	We agree that a fuller description of subsistence use patterns is needed in Chapter 3. See the revised version provided in the Proposed RMP/Final EIS, starting on page 373.
0312-78	Pursuant to ANILCA 810, BLM is required to evaluate whether its land-use decisions in Alaska will significantly restrict subsistence uses and resource, to consider alternatives, and to minimize impacts on subsistence. BLM, however, failed to provide adequate foundation for this "tier-I" subsistence analyses, which requires the agency, in determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public	We agree that a fuller description of subsistence use patterns is needed in Chapter 3. See the revised version provided in the Proposed RMP/Final EIS, starting on page 373. We disagree with the view that the first tier Section 810 analysis in the Draft Plan was inadequate in identifying potential impacts. We believe that the impact analysis properly focused on the unencumbered lands on which the Federal subsistence priority applies, properly documented the intense use of these lands for subsistence uses, and properly concluded that lifting PLO 5150 would result in significant restrictions. The required public hearings have been held, as reported in the Proposed RMP/Final EIS.

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	lands, to evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs. The Draft RMP/EIS failed to provide meaningful analysis of the subsistence activities in the planning area, i.e., the Draft RMP/EIS failed to specify where these activities take place, what access would be required, and the nature of the subsistence uses and resources. BLM's internal guidance requires the agency to "include such things as: information on subsistence uses, subsistence resources in the affected area; current levels of use including commercial, sport, and subsistence within the affected area; and current hunting and fishing regulations." IM at 1-2. Despite its relevance, BLM failed to include any of this information in the Draft RMP/EIS.	
0312-79	As for its second obligation under tier-I, which requires the agency to assess whether other lands are available for the purposes it seeks to achieve in each of the alternatives, BLM summarily found that no other lands within the Glennallen Field Office boundaries are available for meeting the agency's multiple use mandate. Such a conclusion, without illuminating how the agency reached its decision, is inadequate and an end-run around the requirement that BLM seriously consider other lands for the purposes it seeks to achieve in the Draft RMP. See IM at 1-2. Without further information, and a detailed discussion of the activities planned under each alternative, it is not possible for BLM or the public to evaluate the adequacy of the foundation for this determination. BLM should provide the analysis underpinning its decision in adequate detail.	By its nature a Resource Management Plan operates at a regional level, and assesses resource values and potential uses for all BLM managed lands in the planning area. From this standpoint, there are no other BLM lands in the planning area, not already considered in the planning process. In the alternatives, specific management actions are considered on a more site-specific basis. In this context, BLM contends that the range of alternatives analyzed in the Draft RMP/EIS effectively cover the spectrum of feasible and appropriate actions. More specifically concerning the Section 810 analysis, BLM has identified the key components of alternatives that "may significantly restrict" subsistence uses, and has proceeded with additional compliance with the requirements of Section 810. The Section 810 analysis concluded that Alternative B, while not the preferred alternative, would clearly result in restrictions on subsistence uses, and the required Section 810 hearings were conducted. The final Section 810 analysis, included in the Proposed RMP/Final EIS as Appendix E, provides the full analytic justification for the adopted alternative.

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0312-80	Finally, in discussing the third prong of the tier-I analysis, the alternatives that could reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes, the Draft RMP/EIS simply stated that the only way to eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes would be to prohibit any activity that conflicted with subsistence use or subsistence users. BLM then cited its multiple-use mandate as preventing it from managing resources based on single resources, such as subsistence. BLM should not cast the third prong as a paradox: that to eliminate threats to the use, occupancy or disposal of land needed for subsistence, the agency would have to prohibit all other use of the land. BLM provided no foundation for or analysis of its decision to solely examine alternatives that would eliminate the use, occupancy or disposition of public lands needed for subsistence purposes and to ignore the other criteria: that it examine alternatives that reduce the use, occupancy or disposition of those lands. Although its internal guidance instructs BLM to evaluate alternatives that "are other ways to accommodate the proposed action or other actions," the agency failed to perform this analysis.	The Section 810 analysis contained in the Draft RMP/EIS considers the set of alternatives developed in the planning exercise. Clearly one, Alternative B, would significantly restrict subsistence uses. Other alternatives, including the preferred alternative D, were found not to significantly restrict subsistence uses. It is not reasonable, as the comment appears to suggest, that for an Alternative B which would restrict subsistence, there should be sub-sets (sub-alternatives) with reduced effects, when other formal alternatives already provide this contrast.
0312-81	Moreover, BLM failed to account for, or fully explore, mitigation measures, as it was required to do pursuant to the Council on Environmental Quality guidance governing environmental impact statements, 40 C.F.R. 1502.14 (EIS must include appropriate mitigation measures not already included in proposed action or alternatives). BLM should re-evaluate and provide analysis of alternatives that would reduce or eliminate the use, occupancy, or disposition of public lands	Mitigation measures are identified and applied (for the purposes of analysis) to all action alternatives (Draft EIS, p. 607) in Appendix III. In addition, an Environmental Impact Statement is being done for this proposed Resource Management Plan in part because BLM acknowledges that there would be significant impacts associated with some management actions considered in the range of alternatives. The 810 analysis acknowledges this for Alternative B for subsistence.

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	needed for subsistence purposes, and provide adequate foundation for its analysis.	
0312-82	Alternative B is the only alternative for which BLM provided any foundation for its finding regarding the impacts of the proposed land-use plans on subsistence resources, although its discussion was limited to broad generalizations. BLM should provide further information about the subsistence uses and resources throughout the planning area, as well as access to those resources, and should provide details about the potential impacts on those uses, resources, and access. BLM should also clarify why impacts to subsistence resources and access would be only "localized and minimal" under Alternative B.	BLM contends that the analysis of restrictions to subsistence under Alternative B is concrete and specific, amply warranted by the quantitative analysis of Federal subsistence harvests and by the public testimony. Additional description of subsistence patterns will be provided in Chapter 3 of the Proposed RMP/Final EIS, but the key facts for the assessment of Alternative B were included in the Draft. The determination in the 810 analysis that impacts from leasable and locatable mineral development on subsistence would be localized and minimal is based on assumptions for potential development as outlined in “Resource Assumptions” in Chapter 4. These assumptions include the fact that approximately 90% of the lands “opened” to mineral development by withdrawal revocation under Alternative B are currently ANCSA or State selected and therefore have a segregation against mineral leasing or location. These important assumptions have been emphasized in the Proposed RMP/Final EIS.
0312-83	The Draft RMP/EIS also stated that the cumulative impacts of Alternative B could result in significant restriction of subsistence resources. BLM made the same finding for Alternative A. The Draft RMP/EIS stated that BLM would follow the tier-II notice and hearing procedures required by ANILCA 810 to determine the cumulative impacts of alternatives A and B, and would include its findings in the Final ANILCA 810 evaluation. BLM should have conducted the tier-II hearings and should have included a full discussion of its findings and analysis in the Draft RMP/EIS to allow for public participation and informed decision-making.	The 810 Analysis concluded that significant restrictions to subsistence harvest and access would occur under Alternative B. Consequently, seven public hearings were conducted. Testimony at the hearings was not limited to Alternative B or the revocation of PLO 5150 considered in that alternative. In fact, BLM received testimony on several other issues, including OHV management, 17(b) easements, and the Slana settlement area. Clearly, the analysis presented in the Draft RMP/EIS did not limit the scope of the testimony presented at the hearings and did not preclude meaningful public review.
0312-84	The Draft RMP/EIS provided an inadequate foundation for BLM's FONSR for alternatives A, C, and D. The absence of proper analysis to support BLM's FONSR for Alternative D is especially problematic considering that this alternative proposes opening to potential minerals exploration 83 percent of the planning	Please refer to the second part of the response to comment 0312-82. In general, low resource potential and low level of foreseeable development resulted in a finding of no significant restriction.

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	area within the Glennallen District, of which 17 percent is withdrawn d(1) lands.	
0312-85	Because BLM's analysis of subsistence impacts for alternatives A, C and D was broad and lacked specific information on subsistence resources, uses and potential impacts, it failed to provide adequate support for BLM's conclusions. The Draft RMP/EIS failed to describe the subsistence uses that occur in particular regions of the vast planning area. It also failed to identify with any specificity any of the proposed actions that could impact those subsistence uses, or the precise geographic locations of any of the actions proposed under each alternative. Without more specificity regarding subsistence needs, uses and users, and the actions that could restrict those uses, it hardly seems possible that BLM or the public could properly evaluate whether an alternative might significantly restrict subsistence uses. To foster informed decision-making, BLM must provide sufficient detail on subsistence needs, uses, users, and the actions that could restrict those uses before the Proposed RMP/Final EIS.	Additional information about subsistence use patterns, including traditional use areas, has been provided in Chapter 3 of the Proposed RMP/Final EIS, starting on page 373. However, it is important to keep in mind that the Section 810 analysis focuses on those unencumbered BLM managed lands on which the Federal subsistence priority applies. These lands include the pipeline utility corridor and the adjacent Gulkana and Delta Wild and Scenic Rivers. The significant State-selected parcels on the Denali Highway are not subject to the Federal subsistence priority, and are outside the scope of the Section 810 analysis. The uses of those unencumbered BLM managed lands for subsistence, particularly for moose and caribou harvest, were fully analyzed, resulting in the finding that Alternative B would significantly restrict subsistence users.
0312-86	Without much explanation or support, the Draft RMP/EIS highlighted alternatives C and D as reducing the use, occupancy, or disposition of public lands needed for subsistence purposes. Draft RMP/EIS at 524, 527. BLM provided no support for this blanket generalization that anything short of full-bore resource extraction, proposed in Alternative B, would reduce competing uses, occupancy or disposition of public lands. BLM must provide specific data on subsistence resources, uses and users, and describe the geographic areas in which these subsistence activities take place or that are	Additional information has been provided in Chapter 3 of the Proposed RMP/Final EIS, but BLM remains convinced that Section 810 analysis has already demonstrated the major subsistence uses of the area subject to revocation of PLO 5150 and the resulting potential for significant restriction to those uses.

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	needed for access to subsistence resources.	
0312-87	BLM must also discuss in detail its plan for activities that could potentially impact subsistence uses and resources, as well as access, including the potential effects of those activities on the subsistence resources. Because BLM failed to provide this data, the Draft RMP/EIS failed to provide a meaningful tier-1 analysis to support BLM's FONSR for Alternatives A, C, and D. Because the FONSR for Alternatives A, C, and D lacks support, BLM should proceed to conduct tier-II analyses for these alternatives.	We disagree. Analysis of impacts to subsistence from alternatives A – D are displayed on pp. 522 – 535 of the Draft RMP/EIS. This includes discussions on Travel Management and Recreation, Lands and Realty, Natural and Cultural Resources, and Minerals Development. Some reference is made to more detailed discussions under fisheries or wildlife.
0312-88	Although the Draft RMP/EIS provided some discussion of subsistence fisheries in the planning area, primarily the Copper River fisheries, BLM failed to articulate in sufficient detail its plans to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands" in those areas. BLM also failed to articulate whether there would be any restriction on these subsistence fisheries, or any other specific subsistence resources.	More information has been provided in Chapter 3 of the Proposed RMP/Final EIS (starting on page 373) to clarify that the significant subsistence salmon fisheries occur on the main stem of the Copper River, in waters under National Park Service subsistence management. While BLM would potentially manage non-salmon subsistence fishing on the Gulkana and Delta Wild and Scenic Rivers, there have been less than 5 permits requested for this activity since Federal subsistence fisheries management took hold in the summer of 2000. The Draft RMP/EIS did analyze the potential for land use and development activities to directly impact fish habitat or populations. See pp. 461 – 477 of the Draft RMP/EIS.
0312-183	ANILCA 810 analysis: BLM's internal guidance states that, although NEPA alternatives are a mixture of alternative lands and uses and ANILCA 810 requires a distinct separation, if the agency carefully constructs its NEPA alternatives to embrace 810 objectives, it could combine the two objectives. Instruction Memorandum No. AK 86-350, 8-1 (August 26, 1996). Here, not only did BLM fail to provide adequate analysis of the four alternatives to satisfy the NEPA standard, the draft RMP/EIS failed to adequately elucidate BLM's plans to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public	The alternatives described in the Draft RMP/EIS meet appropriate standards for alternatives under NEPA. These alternatives are sufficiently clear about the resulting land use actions to provide for careful analysis of impacts to subsistence uses in Section 810.

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	lands" in the planning area.	
0318-1	The moose population and division of state and federal control of it in regard to subsistence is a problem. I believe that the state should have more control in game management.	Congress has directed the Department of the Interior and Agriculture to ensure a rural subsistence priority is provided on the Federal Public lands. The Secretaries have, since 1990, encouraged the State of Alaska to find a solution to complying with Title VIII so that subsistence management can be reunified under State auspices. Until that is accomplished, the BLM is obliged to implement the standards established in Title VIII of ANILCA.
0326-2	Review of the Evaluation and Findings section for Alternative C make unsubstantiated negative claims regarding the effects of motorized transportation on subsistence uses and needs, as required by The Alaska National Interest Lands Conservation Act (ANILCA) Section 810(a). Specifically, the following comment is not supported by the facts: "Travel and recreation management under the status quo would result in the continued unmanaged and unplanned proliferation of OHV use. Additional and poorly planned OHV trails would continue to compromise the effectiveness of habitat refugia for fish and wildlife by allowing easier and increased access to those areas." (Page 649) It is relevant and important to note that the Alaska Department of Fish & Game area biologists has no documentation that OHV trails have significantly restricted subsistence uses or needs.	BLM stands by the statement made on page 649 of the Draft RMP/EIS. ADF&G, in a series of reports to the Board of Game between 1985 and 1996, clearly recognized existing and potential effects from steadily increasing OHV use, particularly in unit 13. The quote from the 1996 report cited on page 9 of the Draft RMP/EIS clearly states the agency's concerns at that time. While the current State administration and ADF&G personnel are dedicated to providing unlimited access to public lands, it doesn't change the impacts on the ground. They were occurring in 1996 (enough for the local biologist to recommend a Controlled Use area for the Alphabet Hills at that time) and OHV user trends have continued to increase since that time. Specific to subsistence, extensive public testimony during this planning process indicated displacement of Federal qualified subsistence users by growing OHV use by non-local hunters.
0329-126	Conservation would have dramatic benefits for subsistence, that aren't disclosed in the Draft EIS/RMP. Please give full credit to the value of conservation in the revised EIS.	The analysis in the Draft RMP/EIS, starting on page 529, clearly shows that alternative C would provide the most long term benefits to subsistence resources. For example, "Management under Alternative C is the most aggressive in halting the unmanaged proliferation of OHV trails and establishing visitor use limits. Although these measures do not apply to users engaged in traditional subsistence activities, they would benefit the subsistence resources by limiting the recreational pursuit of these resources."
0329-127	Why the scarcity of alternative approaches to subsistence? Reasonable alternatives might include proactive measures to support subsistence, or additional habitat conservation measures, or additional access restrictions to	Please see reply to response to comment 0312-183.

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	decrease competition.	
0329-128	The MSA says, "The majority of river use is focused on or around the Gulkana and Delta Rivers. These two rivers serve as important subsistence hunting corridors." (BLM 2004, MSA Rivers, p.6) While the Gulkana is important, that statement is not true. A great deal of subsistence fishing occurs on the main stem of the Copper other rivers and creeks. Certainly at least as much as on the Gulkana. In fact, we've heard from area elders that fishing the Gulkana didn't used to be done, because that is where the Kings are spawning.	Federal subsistence permit harvest reports are the basis for the BLM statement that the Wild and Scenic River corridors serve as important areas for subsistence hunting. The comment offers the contrasting point that subsistence fishing is less focused on the Gulkana river and more common on the main stem of the Copper River. Particularly since fishing regulations prohibit subsistence salmon fishing in the tributaries, the distribution of subsistence salmon fishing is, indeed, concentrated on the main stem of the Copper River.
0329-129	The Draft EIS/RMP understates the potential negative impacts on subsistence, from action alternatives. Access management, mining, oil drilling, and the rest pose a grave threat to continued rural subsistence opportunities.	BLM stands by its' analysis, given the assumptions used. Please refer to the second part of the response to comment 0312-82. In general, low resource potential and low level of foreseeable development resulted in a finding of no significant restriction.
0329-130	Given the information in the EIS, especially cumulative effects of increased use, decreased habitat, rural subsistence does not appear sustainable. Please consider a real conservation alternative that would achieve long-term sustainability.	We disagree. While the definitions and administration of subsistence may change over time, there will continue to be a dependence on these resources as there has been for thousands of years. BLM is committed to providing habitat to support sustainable populations for subsistence resources. We believe that at least two of the four alternatives considered in the analysis would achieve that goal.
0331-15	The discussion of subsistence was not only brief but also incomplete. We found no mention of subsistence berry-picking, an important activity for most of our members and for many Copper Basin residents. Nor could we find mention of impacts of various activities on the quality of fish, game and berries. Air and water pollution created by mining, mineral exploration, and motorized vehicle use certainly would impact the quality of these resources.	Chapter 3 of the Proposed RMP/Final EIS (starting on page 373) has been revised to include more information on subsistence user patterns and traditional use areas. Pages 522- 535 of the Draft RMP/EIS display anticipated effects to subsistence resources, based on assumed levels of resource development by alternative.
0331-16	We support the greater protections that alternative C provides to subsistence. By creating ACECs and SRMAs, and by placing	Thank you for the comment.

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	stronger controls on mining, logging and road-building, limiting motorized use, Alternative C protects habitats, the quality of the resource taken, and the ability of people who do not have or do not wish to use OHVs to take subsistence resources.	
0354-15	ALTERNATIVE D negatively impacts subsistence by enhanced resource development/extraction, but has a portion for correcting adverse resource impacts from OHV use and halting proliferation of trails that can be combined with ALTERNATIVE C, our preferred alternative.	The assumption used in the analysis, based on low potential, segregation of selected lands, and poor accessibility, was that mineral development, even with opening of 85% of the land base, would be limited to that described under the “Resource Assumptions” section of Chapter 4 of the Draft RMP/EIS. This is the level of development upon which the analysis was based. At this level of development and given the application of area-wide protective measures and Required Operating Procedures and stipulations, we stand by our analysis.
0354-17	ALTERNATIVE D revokes most ANSCA (d)(1) withdrawals, opening 85% of the land base to mineral extraction, which has an extremely negative impact on subsistence.	Chapter 4 of the Draft RMP/EIS and the ANILCA 810 analysis in Appendix V analyze the effect of implementation of Alternative D on subsistence. Because of the anticipated level of mineral development, application of area-wide protective measures, and application of Required Operating Procedures and stipulations identified in Appendix III of the Draft RMP/EIS, these analyses found that the impacts to subsistence would not be significant.
0355-43	Regarding subsistence - there is no justification to keep lands closed or PLOS in place due to subsistence. The lands were not closed for subsistence purposes and must not remain closed based on any subsistence purpose. Where the reasons for withdrawing or closing lands has been satisfied, removal of the closures should not be contingent on any other factor.	BLM's decisions in this planning process must be consistent with ANILCA. As such, we are mandated under Section 810 to consider the impacts of our actions on subsistence uses and resources. While you are correct that the original purpose of PLO 5150 was not to provide a federal subsistence hunting area, this is what the area currently provides. Please read the comments concerning this proposed action under alternative B and contemplate what would happen if we ignored them in our decision making process. Please recognize that all lands within the pipeline/utility corridor are not closed to mineral entry--only the inner corridor. Nor are they closed to other uses such as recreation or timber management.
0386-2	There's some Federal responsibility in regards to that.[management of the pipeline corridor] ANILCA has the -- the Katie John issue was all about protecting subsistence, protecting subsistence along the river corridors and that's what the Supreme Court and United States Government said, that they need that -- the Federal people have to step in and protect the subsistence rights of the people and this is no different than that type of case. Because the	BLM is committed to continuing to provide a manageable federal subsistence hunting area as well as protection of subsistence resources. That is why retention of most of the pipeline/utility corridor is described in the Proposed Action of the Proposed RMP/Final EIS.

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	Federal has a responsibility under ANILCA to protect the subsistence use of the people that are using it in these areas.	
0390-1	And here the trespassing in the state of Alaska including the AHTNA region has a great impact on our subsistence lifestyle for both Federal and State, there is no rural priority with BLM. BLM needs to enforce ANILCA and protect all of our lands and water resources. As we AHTNA people rely on our culture and our customary and traditional use for that fish and game resources as this is our land, the way we live for years, you know, for many years, that we always rely on the moose and fish that's been going through here.	The State formerly implemented a subsistence management program that complied with Title VIII of ANILCA, until this was overturned by the Alaska Supreme Court. Since then, the Federal Subsistence Board has directly managed the title VIII rural subsistence priority on Federal Public lands. BLM does provide a rural priority and is committed to continue doing so.
SOCIAL AND ECONOMIC CONDITIONS		
0173-1	Alternative C would chase the Mineral Exploration industry out of Alaska, costing the local and State of Alaska economy hundreds of millions of lost revenue.	The Draft RMP/EIS acknowledges (p. 531) in it's analysis of effects of implementation of alternative C, that "no new jobs would be created from resource development."
0311-1	The BLM “Draft Plan” does not adequately evaluate potential impacts to salmon habitat and salmon fisheries from proposed development and land use options. The plan makes no attempt to quantify potential impacts to the economy, or lost value and revenue to the region from various development scenarios offered within the alternatives. … Although the plan addresses sport and subsistence, it fails to mention commercial fisheries, the largest economic contributor to the Copper River watershed. Although commercial harvest does not occur on BLM land, the salmon and much of the habitat they depend on are managed and administered by the BLM. Each decision made related to alternatives in some way affects salmon, people and economies that depend on them. With economic indicators and	Economic effects are considered in Chapter 4 of the Draft RMP/EIS. See response 0355-34. However, you are correct in your assertion that there is no analysis of the effects to the commercial salmon fisheries and the economics associated with it. This analysis is not included for the following reasons: 1) BLM manages only 15% of the lands within the Copper River watershed; 2) Management decisions along the Gulkana River, the most important salmon fisheries on which BLM manages the uplands, are common to all alternatives (see page 76). This management will continue to provide strong protection along the Gulkana, which provides critical spawning habitat for Chinook and sockeye salmon; 3) ADF&G manages populations, BLM manages habitat; 4) Current State and Native selections prevent mineral development until either conveyance occurs (in which case development is up to the selecting entity) or selections are relinquished and the lands are retained in long-term federal ownership; and 5) On most unencumbered BLM within the watershed (Wild and Scenic Rivers, pipeline/utility corridor) withdrawals prohibiting mineral entry or leasing will be retained. Given these factors, even under the most aggressive development scenario (Alternative B) the BLM anticipates minimal impact to salmon habitat and particularly salmon populations within the watershed. An analysis trying to display differences between the alternatives in impacts to commercial fisheries would not display significant differences.

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	analysis absent from the plan, it is impossible to make informed decisions on the alternatives. ...The plan should be modified to include a comprehensive fisheries and economics section, and management options should be evaluated as to how they will impact the sustainability of salmon populations and the value of the salmon economy.	
0311-2	I offer the following information on salmon values: EX VESSEL VALUES In Thousands of Dollars YEAR CHINOOK SOCKEYE COHO Total Value 1994 1,630 10,960 7,550 20,140 1995 3,750 13,570 4,520 21,840 1996 2,320 24,720 1,720 28,760 1997 2,450 25,290 370 28,110 1998 3,990 15,560 950 20,500 1999 5,700 20,710 790 27,200 2000 2,710 14,660 3,460 20,830 2001 3,220 15,420 1,320 19,960 2002 2,391 16,332 2,195 20,918 2003 3,872 18,326 2,058 24,256 2004 3,757 14,881 3,418 22,056 10 year average 3,253.64 17,311.73 2,577.36 23,142.73 I have attached a spreadsheet that includes additional information on the financial aspects of the commercial fishery, but the quick take is that the fishery averages about $22million a year directly to fishermen, and another $18million to cannery workers, tender men, and shore side support. Estimates of value for the commercial sport guide industry, sport and subsistence is placed at about $5million, making the fishery a $45million a year	See response to comment 0311-1.

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	economic driver.	
0311-3	We oppose any increases in these activities [mining, oil and gas leasing, logging] until an analysis is completed that includes potential economic impacts to fisheries.	See response to comment 0311-1.
0311-6	The BLM should reject the current draft as it has been presented and institute a planning process that includes an economic assessment of the impacts of various land use options.	The Draft RMP/EIS analyzes effects of the implementation of the four alternatives on social and economic conditions. Please refer to pp. 522, 528, 529, 531, 534, and 535 of the Draft RMP/EIS.
0330-4	Overall, smaller scale resource extractive activities can be beneficial to the local economy on a seasonal basis, such as log ship stevedoring. However, the most sustainable resource Yakutat has is its fishery resource, which has supported the town for over 100 years commercially. This resource is readily renewable and should take precedence over shorter term projects.	Thanks for the comment. BLM's preferred alternative (D) would designate BLM-managed lands in the vicinity of the Bering Glacier as a Research Natural Area. This designation will provide measures to protect the area's unique ecological features associated with the glacier (see table, page 602, Draft RMP/EIS). Despite lifting existing ANCSA withdrawals on the eastern 1/3 of the area, very little mineral exploration or development is anticipated, due to rough topography and poor access. BLM feels that it's preferred management strategy for the area would provide protection to the area's anadromous rivers and streams.
0355-34	For nearly a decade, the Valdez Creek Mine was the largest private employer in the entire Mat-Su Borough. The economic impact of VCMC was tremendous and there are numerous mineral exploration projects that, if they become miners, would be much larger than VCMC. The economic benefits of such projects must be considered. Even though most of the claims are on State land, the plan should recognize this, especially where such claims will require access over BLM lands.	The effects of potential mineral development and jobs created by such development are considered in the Draft RMP/EIS. Please refer to pp. 528, 529, 531, 534, and 535. Information has been added to the Proposed RMP/Final EIS to include the economic benefits to local service businesses from mineral development.
0355-39	There is no effective analysis showing the benefits of mineral development. Just the opposite, the EARMP talks only about the supposed negative (page 482) impacts and goes so far as to say that Alternative B that may see the most mining would have the greatest negative impacts. What about t he personal satisfaction and self esteem that results when a person has a good quality job	Please see response to comment 0355-34.

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	near where they live that can provide for their family? These benefits are totally disregarded in the EARMP. We have excellent examples of the benefits derived from mining and exploration from the Red Dog Mine and the Donlin Creek Project.	
0369-2	It [the plan] also overlooks the economic impact that would be caused by the loss of area available for subsistence hunting.	Actually, the Draft RMP/EIS acknowledges the economic importance of subsistence (see pp. 341, 343). It also discusses the economic impacts of revoking PLO 5150 on pp. 527 and 528.
ENVIRONMENTAL JUSTICE		
0198-1	I am 63 years old and the game I hunt in this area are not of the suit-case size. This plan strikes me as a ban or at the least discrimination against us old folks.	Please see response to comment 0199-1.
0199-1	I am 68 years old, and hunting in this area. The plan seems to discriminate against use old folks.	BLM does not agree with you that the plan discriminates against the elderly. Your comment refers to OHV management considered within the Draft RMP/EIS. Even under the most restrictive Alternative C, only 4% of BLM-managed lands in the area would be managed as non-motorized. No matter which alternative you look at, there will still be ample opportunities for motorized access to recreation, hunting, fishing, and subsistence uses in the area.
0354-37	Plans, though cannot benefit one group of people, must also not harm one group of people. Some actions proposed in the RMP negatively impact the Ahtna people, our lands and landowners rights, and our subsistence lifestyle and socio-economic well-being.	The Draft RMP/EIS acknowledges this effect on page 529 of the Draft RMP/EIS under "Environmental Justice." This effect is described as a result of revoking PLO 5150 under Alternative B.

8. RMP/EIS PROCESS

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GENERAL PROCESS		
0020-3	There's no enforcement of all these regulations being placed on those of us in the Native community, be it non-Native subsistence users, or even Native land managers. Unfortunately, it's placed us in a hostile environment many times, especially with the state of Alaska.	BLM is committed to providing enforcement of its regulations on BLM-managed lands. The Glennallen Field Office recently hired a second law enforcement ranger. However, regulations dictate our ability to enforce on some areas, such as 17(b) easements. Please see response to comment 0379-3 under Access.
0020-5	Other parts of ANILCA need to be brought into this plan that you're not bringing in. ANILCA, Section 811 deals with access. I see we've got 810 in there, but 811 is access. ANILCA 1107, dealing with right-of-ways; 1110 dealing with more access; 1316, allowable uses; Section 1318, the list goes on. Section 1107 of ANILCA has requirements for restoration, revegetation and containment of erosion, 1107(a) talks about the damage to the environment including the damage to fish and wildlife habitat. There's a number of protections that were provided in ANILCA, however, form on the ground they're not being adhered to.	Section 811 of ANILCA is specifically addressed on page 34 of the Draft RMP/EIS: "All proposals for OHV management considered below would be consistent with section 811 of ANILCA…" Title 11 of ANILCA and specifically section 1107 deal with rights-of-way across public lands that access or cross Conservation System Units. BLM will comply with 1107 in consideration of right-of-way applications or right-of-way management within CSUs (the Delta and Gulkana wild and scenic rivers are the only BLM-managed CSUs in this planning area).
0020-6	There needs to be an increase, really, for the cabins, public cabins up there. You want to do inventory and monitoring of visitor use, those are lofty goals but where's the money. Please, you need to apply to Congress for money on these. You can't be giving more regulations without enforcement money.	Inventory and monitoring are part of our annual budget proposals and operations. BLM is committed to continuation of inventory and monitoring, as described for each resource in Chapter 2 of the Draft RMP/EIS. It will continue to be an element in the activities of the Glennallen Field Office, contingent on annual budget.
0023-1	I'm wondering, under ANCSA and ANILCA when all of the land claims are going to be settled? Putting hundreds of thousands of dollars into this [plan] and whatever else you	The Lands Transfer Act was recently signed by Congress and will speed up the conveyance process of all land entitlements. It is scheduled to be completed in 2009. This process, and the speed of this process, is outside the scope of this planning document. See Draft RMP/EIS page 13.

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	folks do before you've settled something that was passed years and years and years ago seems to me to be putting the cart before the horse. Settle the laws that were on the books in the '70s before we start making new ones.	
0033-1	The first general comments I have is in regards to the consultation process. If you'll note on Page 21, there's reference to consultation with village corporation and the same reference is made on Page 563, I believe, there are no village corporations in the AHTNA region. The villages merged in 1980, and have been merged with AHTNA since. There are, however, tribal councils, in the area which function both as local governments. And I'll note in another section of the report there's a reference to there being no local governments, which is clearly wrong. So there's several corrections that need to be made to the initial Draft here in terms of, not only the types of entities that are representing constituents in the region but also to the fact that tribal councils, which predate the United States government by some several thousands of years have been inadvertently left out and need to be put in the proper context.	This change has been made in the Proposed RMP/Final EIS.
0033-2	[U]nless you have a detailed background on some of the issues that are alluded to in the study it's very difficult to draw conclusions. For instance, when you use the term development, there's no standards of reference within the study itself and there's no agreed upon use of the term that you can find in the study. So you either hint it or refer it and that's not a good way to produce a conclusion.	The issues presented within this document are very complex. In Chapter 2 of the Draft RMP/EIS, BLM has produced a summary of each issue as a means of comparing management strategies. An alternative comparison table will be provided in the Proposed RMP/Final EIS (page 171).
0033-3	Native allotments have predated both the state of Alaska and a number of agencies up here by quite a period of time. And the study itself	The Draft RMP/EIS does not mix Native allotments and 17(b) easements. They are presented and discussed under different Issues: 17(b) easements are discussed under Travel Management and Native allotments are discussed under Lands and Realty

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	mixed Native allotments access questions with 17(b) which shouldn't be done. 17(b) easements were clearly a function of the Alaska Native Claims Settlement Act in 1971 and just as clearly Native allotments were a separate legal issue. And when you mix all of them up together you create a compressed version of what the public might consider access issues. Native allotments has no access issues, they never will. They stand alone. And you need to look at those kinds of information if you're going to deal with the Native contingency.	throughout the document. Some comments we have replied to referred to 17(b) easements crossing Native allotments.
0034-2	I think that more money should be appropriated for proper management and for the monitoring of the impacts that these ORV's have on our land.	Through the identification of the issue of OHV use and management within this planning document, the first steps for justifying the need for increased funding have been initiated. However, as stated on page 365 of the Draft RMP/EIS, under General Assumptions "Actions outlined in this plan are contingent on appropriate funding and personnel."
0044-28	The Alaska Native Claims Settlement Act provisions should not be revoked or changed without consent of all Alaska Natives.	This planning document does not change any provisions of the Alaska Native Claims Settlement Act.
0050-1	I open up this packet given out by BLM I keep coming up with what is called the BLM Preferred Alternative. See, when we have hearings we try to gather up all the issues and we don't have a preferred alternative before we start. This has bothered me from the very first meeting that I've attended, and it continues to bother me that the deciding organization has a preferred alternative already; you haven't got all the testimony, you haven't gone to all the communities, you haven't gotten all the pertinent information but you have a preferred alternative.	See response to comment 0093-1.
0060-18	[W]e urge BLM to begin implementation level planning within one year of the Final RMP, in order to adequately address the management of areas that are already becoming degraded.	Thank you for your comment. The implementation level plan for the Delta Wild and Scenic River Corridor is scheduled to begin in 2006.
0066-1	Put some language in there where it takes	The 90 day public comment period on the East Alaska Draft RMP/EIS was the

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	public comment before decisions are made to do anything other than alternative A.	opportunity for the public to comment on actions that would be different from current management (Alternative A). All implementation level decisions will also include an avenue for public involvement.
0069-2	Of particular concern in C and D. We would find that there is a lot of verbiage that would leave the potential for future restrictions to be put in place without a lot of public process. If you could, perhaps, amend that language, and incorporate into D a very open and public process then I think we would find it much more palatable.	The Draft RMP/EIS states "These planning processes would include public, State, and Native coordination." (p. 33, under Implementation level planning).
0080-8	Further be it resolved, the Southcentral Regional Council recommends that BLM seek adequate funding from Congress to fully implement the provisions of the East Alaska RMP.	Through the identification of the issues and management strategies within this planning document, the first steps for justifying the need for increased funding have been initiated. However, as stated on page 365 of the Draft RMP/EIS, under General Assumptions "Actions outlined in this plan are contingent on appropriate funding and personnel."
0093-1	I feel that you ask for our input after you have already made your decision. You already had problems and answers you wanted. You stated that the problems came from other sources but were these sources Alaska residents?	All of the scoping comments received that were used to develop the alternatives, came from Alaska residents, not from organizations or individuals from the Lower 48. Appendix VI of the Draft RMP/EIS outlines all of the public involvement opportunities that were used to identify the issues evaluated within the plan. In the Draft Alternative stage of the planning process no preferred alternative was identified. Public comments were solicited on the draft alternatives and used to determine a preferred alternative. The identification of a preferred alternative is consistent with the BLM Land Use Planning Handbook and NEPA and allows the public to have an idea of what the BLM is thinking or leaning towards. The BLM preferred alternative is NOT the final decision and may be modified to include components of all alternatives as a result of public input on the Draft RMP/EIS.
0093-3	More information also needs to be given about Anilca [sic] and how it REALLY affects Alaska. Since lawyers drew it up only lawyers will be able to interpret it, not the regular citizen.	Consistency with ANILCA is clearly explained in the text of the Draft RMP/EIS where necessary (see for example page 34 of the Draft RMP/EIS under Travel Management). This planning process or RMP will not amend ANILCA.
0097-5	[W]e see a number of issues arising, between Plan approval and the conclusion of implementation planning, which can and will affect both the interim and final management of OHVs despite what is proposed in the Preferred Alternative. These issues include: implementation planning may take up to five	Thank you for your comment. Implementation Level considerations were outlined within this planning document under Travel Management to give managers a place to start when undertaking implementation level plans, consistent with the goals and objectives outlined in the Draft RMP/EIS. Some implementation-level considerations could change based on public input and State and Native coordination during implementation-level planning. Land conveyances are out of the scope of this plan, as stated on page 13. However, this Draft RMP/EIS provides interim management direction for selected lands.

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	years after the Plan is approved; the final results may not match the "Implementation-level Considerations" proposed and it is not clear which of the acres currently selected by the state and native corporations will revert to BLM and be subject to the protections or restraints proposed to be adopted through implementation planning.	
0097-9	Should this proposal be inserted [to revoke PLO 5150] into the Final Plan, we firmly believe the public must be given another opportunity to comment on the revised proposed Plan, since we believe it would substantially change any number of elements and therefore would not be the Plan which had been submitted to the public.	Revocation of PLO 5150 is not considered as part of the preferred alternative (D) in the Draft RMP/EIS. However, it is considered and it's effects analyzed under alternative B. The public has had ample opportunity to express opinions about this proposal during 90 days of comment period.
0159-5	Such a transfer [revocation of PLO 5150] would significantly change the Preferred Alternative due to the impacts to recreation, SRMAs and travel management. I believe a new Preferred Alternative would have to be presented for public review prior to any final decisions or final Plan.	Please see response to comment 0097-9. Effects of this proposal on recreation management are considered in the Draft RMP/EIS. However, Chapter 4 has been edited in the Proposed RMP/Final EIS (page 426) to clearly state that effects to recreation with revocation of PLO 5150.
0160-2	BLM should prepare a separate EIS, should this proposal [revocation of PLO 5150] be adopted. It should completely analyze these impacts, including the loss of oversight of the joint pipeline office.	Please see response to comment 0097-9. However, Chapter 4 has been edited in the Proposed RMP/Final EIS to include potential effects to pipeline administration resulting from revocation of PLO 5150 (page 549).
0164-1	Congress must appropriate money for the implementation and enforcement of the EARMP specifically the active management and maintenance of 17b easements, enforcement of trespass, and repatriation of damages to Ahtna lands caused by 17b easements. Money is also needed for the research of 17b easement use that can be used in a relinquishment determination.	Please see responses to comments 0080-8 (on funding) and 0020-3 (on enforcement).
0164-2	Congress must appropriate money for the BLM	Please see response to comment 0080-8. Also, Glennallen Field Office has recently

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	to comply with and enforce all ANILCA mandates and other statutes affecting easement management.	hired a second law enforcement ranger. The position is expected to receive continued funding.
0164-13	BLM needs to enforce ANILCA Section 1107 for protection of land and water resources.	Title 11 of ANILCA and specifically section 1107 deal with rights-of-way across public lands that access or cross Conservation System Units. BLM will comply with 1107 in consideration of right-of-way applications or right-of-way management within CSUs (the Delta and Gulkana wild and scenic rivers are the only BLM-managed CSUs in this planning area).
0173-39	No areas should be studied for further land management restrictions, including wilderness designations, wild and scenic rivers, ACEC, etc. The ANILCA "no more" clause does not allow such studies. A secretary's decision prohibits such studies unless the Alaska Congressional Delegation and the governor agree and so request.	The ANILCA "no more" clause does not apply to ACEC designations, which are administrative and not congressional. BLM Manual 8351 and the Land Use Planning Handbook require us to "assess all eligible river segments and determine which are suitable or non-suitable per Section 5(d)(1) of the Wild and Scenic Rivers Act…" We did not conduct wilderness inventory as part of this planning process, nor are wilderness designations considered. See page 15 of the Draft RMP/EIS.
0173-43	We further suggest that the mineral and access data be incorporated as the first phase in the Plan development. Then this will provide a base map for all other work and will greatly assist in the minimization of future conflicts - both in the planning process and in the actual use of the Plan once it is completed.	Mineral data (Mineral Occurrence and Development Potential Report) and access data were both included as part of Management Situation Analyses prepared during the planning process. This data was utilized in development of management alternatives that are presented in the Draft RMP/EIS.
0175-4	Limits on general public use and access in ANILCA CSU's (Wild and Scenic River corridors) require additional procedural steps under 1110(a). We recommend following this ANILCA process (articulated in 43 CFR Part 36) on non-CSU lands such as the Denali SRMA, the Bering Glacier RNA, the Tiekel SRMA and the West Fork ACEC. Such a public process will allow BLM to better address many of the concerns raised by the public and the State regarding limits on use and access. The State in its review of the East Alaska DEIS/RMP is interested in documentation that management actions on non-CSU lands in Alaska are justified, reasonable, and evaluated	BLM will adhere to ANILCA's intent when considering limitations or closures that would effect access, even on non-CSU lands. BLM shows commitment to this statement in the Draft RMP/EIS (page 33), where we commit to public involvement during implementation level planning in travel management areas where we have identified the need for OHV limitations. During implementation level planning, BLM will demonstrate why limitations are necessary, based on objectives for a given area. Note that these objectives may be socially driven (such as management to maintain an experience) as well as resource-driven.

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	through a public process involving appropriate stakeholders, conducted through an implementation level planning process with more specific focus than the RMP process can provide.	
0175-5	As previously stated, the State does not support limitations to manage general use of public lands without further justification and a more focused public process. The State is pleased to see that many of the Alternative Tables do speak to the identification of appropriate objectives for specific management purposes to be accomplished through implementation level planning. We encourage BLM to continue to utilize this approach throughout the planning document.	Thanks for the comment. See response to comment 0175-4.
0175-8	While there is no requirement to address coastal zone management issues in an EIS, such a discussion will help identify potential issues that could arise during state reviews of activities proposed in the future. It would be helpful to explain, perhaps within the Background section in Chapter I, when Alaska Coastal Management Program (ACMP) reviews will be required for federal activities proposed in this planning area. Because the RMP/EIS focuses on general land use management strategies, it is unrealistic for BLM to develop a meaningful consistency evaluation upon which the State could initiate a consistency determination. The State prefers to consult with BLM and provide its coastal zone consistency determination on specific implementation activities as they are proposed.	BLM will utilize coordination on coastal zone management issues at the specific implementation level (on projects that might have an effect on Coastal Zones) rather than the Land Use Planning level.
0175-10	We suggest that BLM consider including an introductory section at the beginning of Chapter II entitled “How to Read this Chapter” (similar to that included in Chapters III and IV) that	The change has been made in the Proposed RMP/Final EIS (page 35).

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	describes the organization of each issue and clearly describes the difference between an "RMP Decision" and "Implementation-level Considerations" and where and when one might expect to find implementation level considerations described in the alternatives. We request this text include the important clarification that the decision-making process is flexible and will be based on a subsequent management planning process. This subsequent decision-making process is likely to consider the "Implementation-level Considerations," presented in the action alternatives, particularly Alternatives C and D but this RMP/EIS does not prejudge the results of the subsequent planning process. These alternatives should clarify that future decisions will be based on the information, discussions, and outcomes of the implementation level planning process. Several of the following comments provide additional information on several of the implementation-level considerations. We request that those comments be considered for discussion as part of the future implementation level planning process.	
0175-15	The State requests that Implementation-level Considerations described in Alternatives C and D be modified to acknowledge that decisions on any further limitations will be based on information, discussions, and outcomes of the implementation level planning process.	This change has been made in the Proposed RMP/Final EIS.
0175-22	We request that the discussion in (8) Tiekel Area (including Tonsina Sub-units) section (a) RMP Decisions regarding potential area closures for snowmachines be moved to section (b) Implementation-level Considerations. We recommend that further	The level of decision making described is consistent with direction outlined in the Land Use Planning Handbook Appendix C which states that "All public lands are required to have off-highway vehicle area designations (43 CFR 8342.1). Areas must be classified as open, limited, or closed to motorized travel activities". Identification of the Tonsina Subunit and the non-motorized management goals for the area is consistent with this direction. There has been extensive public participation in the development of the

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	restrictions such as closures be developed in consultation with the user community through development of an implementation-level plan that includes a public process.	alternatives that identify this sub-unit. This sub-unit is considered as a direct result of public involvement. Also please see response to comment 0175-10.
0185-3	I am disappointed that the Alaska BLM website is not in operation during this comment period. This limits access to the complete draft plan/EIS in a timely fashion.	Please see the response to comment 0323-8.
0208-1	I have reviewed and am current on the issues surrounding the Knik River Public Use Area. … These lands should not be locked away from motorized use.	The Knik River Public Use Area is not within the East Alaska Planning Area and motorized use in that area is not covered in this planning document.
0306-6	I am disappointed that the Alaska BLM website is not in operation during this comment period. This limits access to the complete draft plan/EIS in a timely fashion. Thank you for the opportunity to comment on the management of our public lands.	See response to comment 0323-8.
0310-2	Since 5.5 million acres of the planning area is to conveyed to the State of Alaska, these lands should be conveyed before this plan is completed. It is a waste of resources to go through the planning process for lands that are to be conveyed in the near future.	The new Resource Management Plan is necessary for several reasons, including: •Glennallen Field Office currently operates under a Management Framework Plan that was done in 1980. It is outdated. Since 1980, the area has seen dramatic increases in recreation use and Off Highway Vehicle use for recreation and hunting. Withdrawals that were placed on the land as a result of the Alaska Native Claims Settlement Act need to be assessed and determinations made whether or not to retain them. With renewed interest in mineral development in the area, BLM needs to determine which areas would be available for exploration and development. The RMP will address these issues. The State of Alaska is over-selected, so potentially as much as 25% of the 5.5 million acres of selected lands in the area could be retained by BLM.
0312-108	We request that the Mineral Occurrence and Development Potential Report for the Glennallen Field Office Planning Area, completed in 2004 by the Branch of Solid Minerals, be included in the Proposed RMP/Final EIS as an appendix.	The information presented in that report is used summarized in Chapter III, pages 325-340 and is considered in the effect analysis on pages 517-521 of the Draft RMP/EIS. In an effort to keep the Final as concise and clear as possible, it is not included as a separate appendix. This entire Mineral Occurrence and Development Potential Report is available for the public to review upon request from the Glennallen Field Office.
0313-1	State selected lands should not be considered in this plan.	State selected lands are BLM-managed until conveyance, consistent with ANILCA section 906(k). That is why they are included in this planning effort. As noted in the Draft RMP/EIS (page 564) there was a high level of involvement and cooperation/coordination with the State of Alaska in this planning process to ensure that

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		management direction for State selected lands is consistent with State management direction.
0313-4	With more time we could provide more comments, but a 90 day comment period for a 700 page document is insufficient especially with the difficulty of downloading the plan as originally planned due to BLM's website trouble.	See response to comment 0323-8. We have received approximately 4,500 comments on the Draft RMP/EIS and only two of them (including yours) requested more time. We feel that a 90-day review period is sufficient.
0315-1	The plan should ensure that future long-term use is considered. Whether it be trails or other development, the resources of the land should be available for generations to come.	We agree. BLM is mandated to provide for multiple use management. This is clearly stated in the planning criteria on page 16 of the Draft RMP/EIS and is reflected throughout the Draft RMP/EIS.
0323-8	In general, EPA is concerned that information related to development of this EIS, available primarily through the BLM's web site, is not adequately accessible to the public, especially in light of the long period of time the BLM Alaska web site has been shut down for security upgrades. Efforts by the BLM to successfully distribute information regarding this EIS in a timely manner to the public should consider implications of current and future shut downs of the agency's web sites.	All public information distributed during the period of time that BLM websites were down contained alternative formats to obtain and review the Draft RMP/EIS. A special mailing was also sent to all those on an extensive mailing list highlighting the fact that the website was down and describing alternate means to obtain a copy of the Draft. Although it was unfortunate that the websites could not to utilized, CD and hard copies of the Draft were distributed upon request. BLM feels that the websites being down did not cause excessive hardship for obtaining a copy of the draft for review purposes.
0323-17	EPA recommends that BLM provide opportunities for the public to provide input on future resource development proposals and review future draft decision documents. EPA also recommends that additional detail regarding how BLM may tier off this RMP and EIS in order to evaluate and approve future proposed actions in accordance with NEPA be added to the Final EIS. EPA requests the opportunity to review future decision documents, including Environmental Assessments, for resource development proposals and other proposed activities that may cause adverse impacts to environmental, cultural, and subsistence resources in the	Implementation level planning is subject to NEPA analysis, which provides further opportunity for public review and comment. We will add EPA to our mailing list for all projects.

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	planning area.	
0326-4	The AOC recommends that the lands within the EARMP area that are to be conveyed to the state and native landowners should be conveyed prior to adopting this plan. The planning process for lands that will change ownership in the near future is not a productive use of resources or time.	See responses to comments 0310-2 and 0313-1.
0329-1	Why doesn't the Draft EIS/RMP explain or even disclose the issue of the disappearing Draft Alternatives for review? All it says is "500 draft alternative packets were distributed." (p.21) We remain concerned, and repeat our previous comments and questions (July 2, 2004) about this debacle: Why were the blue versions disappeared? We are dismayed by the re-write of alternatives done between April 13 and 29 (hereafter “original” and “modified” versions). Many good and reasonable management alternatives were removed entirely, without explanation. This is a misuse of power that circumvents the proper public process, and is in violation of federal law (see specifically 43 USC 1712, 43 CFR 1610.4-5, NEPA, and its implementing regulations). Most importantly, these changes largely nullify the good work the Glennallen Field Office did to solicit public comments, and to sincerely incorporate them into draft alternatives." NEPA requires that scoping be an open process or meaningful agency and public involvement becomes impossible. FLPMA also requires that land use planners " shall…use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences." 43 USC 1712(c)(2)	The "blue versions" were draft alternative packets that were mistakenly distributed prior to State Office review. Because this planning area deals with a large amount of State and Native-selected lands, BLM-Alaska wanted to be sure that BLM management of these lands was consistent with BLM policy and direction as well as ANILCA and ANCSA. State Office review resulted in changes to the "blue version" that more accurately reflected this policy and direction. As noted in the Draft RMP/EIS, the Draft Alternative packet was then distributed widely for public comment, and changes were made based on comments received. NEPA certainly does not prevent or discourage internal review, as a matter of fact it emphasizes an interdisciplinary process. The "blue version" was simply a draft of a draft that was distributed prematurely.
0329-9	It is unclear why the unique Bering Glacier region is being lumped together with the lands	The land managed by the BLM in the Bering Glacier area is within the administrative boundaries of the Glennallen Field Office which also happens to manage the lands along

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	at the Denali, Susitna and Copper River headwaters. Why are they being managed together? Please be very cautious to recognize the unique values of this place. Don't rely on one-size-fits-all mitigation measures.	the Susitna and Copper Rivers and the Denali Highway. The designation of a Research Natural Area proposed in Alternatives C and D consider and give protection to the unique values of the region.
0329-53	Inventory and Monitoring is a central mission of BLM, and should be a high priority. Between the blue and green copies of the draft alternatives, inventory and monitoring goals and objectives were disappeared. Why? Please re-instate the goals and objectives in the original draft alternatives for review.	Inventory and monitoring actions are outlined for each issue in Chapter II under Management Common to All Alternatives. See pages 33, 55-56, 73-74,113-114 and 122 of the Draft RMP/EIS.
0329-66	Fisheries should have been a key issue in the Draft EIS/RMP. Copper River Salmon in particular are of immense value. Why was the fisheries section removed, after the original version of the draft alternatives?	Fisheries within the planning area are described on pages 244-250 of the Draft RMP/EIS. The effects of proposed alternatives on fisheries and fish resources is discussed on pages 461-477 of the Draft RMP/EIS
0329-189	Management is greatly complicated by the fact that "almost every trail within the planning area crosses multiple jurisdictions." (p.161). Integrated management is critical. The watershed is interconnected.	We agree. That is why the BLM has coordinated with the State, Ahtna Inc., Chugach Alaska Inc., National Park Service, and the Forest Service during this planning effort. We are committed to continuing this level of coordination during implementation level planning.
0330-3	For Yakutat lands, alternative D is too broad in scope. In addition, it does not reflect the CBY Assembly ratified Coastal Management Plan for Icy Bay to Cape Suckling. In this plan, chapter 7 page 58 the Multiple Use Intensive Land Use Designation is restricted to non-BLM lands from Icy Bay to Cape Yakataga. The BLM lands slated for Oil and Gas Leasing and Mineral Entry in Alternative D occur to the North and West of the CBY holdings and are designated Natural Areas and Multiple-use Recreation, Research, Residential Emphasis. Therefore the land designation change proposed for alternative D is inconsistent with the borough plan. The borough plan mandates that we must support alternative A as most	The preferred alternative (D) of the Draft RMP/EIS would designate BLM-managed lands in this area as a Research Natural Area and prescribes measures to protect the unique ecological values associated with the glacier. The withdrawal that currently exists on the eastern 1/3 of the area would be recommended for revocation. However, this does not mean that mineral development would take place. Based on topography, limited access, limited infrastructure, and low mineral potential in the area, likelihood of development is considered low. BLM feels that it's management direction under the preferred alternative is consistent with the borough's goals for the area.

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	compatible with our plan.	
0341-2	The original Draft Plan [preliminary draft alternatives, April 2004] focused on reducing ATV impacts to salmon, reducing trespass, protecting subsistence and addressed other issues of local concern. For some reason left currently unexplained, the original draft plan, developed through a consultive process that included local input, was substantively altered prior to its release for public comment. The elimination of the entire sections is an indication that politics, not land use planning, was a major influence on internal plan edits that limited the options for meaningful public dialogue and comment. In addition, specific alternative management options were eliminated from the original draft prior to release to the public for comment, including an option to consider the Copper River watershed an Area of Critical Environmental Concern (ACEC).	Please see response to comment 0329-1.
0341-5	The current draft BLM plan fails to serve the best interests of the public because it fails to present relevant information and options. The plan should be substantively modified to include a comprehensive fisheries section, and management options should be evaluated as to how they will impact the sustainability of salmon populations. In addition, management prescriptions that were administratively removed from the “local workshop draft” document should be reinserted in the amended draft, and the plan should again be offered to the public for comment.	Fisheries within the planning area are described on pages 244-250 of the Draft RMP/EIS. The effects of proposed alternatives on fisheries and fish resources are discussed on pages 461-477 of the Draft. The Draft RMP/EIS focuses on impacts to fisheries habitat because that is what BLM manages, not populations. Reasons for not including an analysis of impacts to salmon populations, and in particular impacts to commercial fisheries, are described in response to comment 0311-1 (under social/economics). For an explanation of the "local workshop draft" see response to comment 0329-1.
0341-15	The BLM should reject the current draft as it has been presented and institute a planning process that includes options and information critical to informed decision-making. The BLM	The public involvement efforts untaken for this planning process have exceeded the requirements of NEPA. This planning process has been shaped by public comment and involvement. Appendix F lists all public involvement opportunities to date including 30 scoping meetings, 14 draft alternatives meetings, and 7 public hearings on the Draft.

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	is statutorily required to fulfill its obligations for meaningful participation by the public. The public deserves no less.	This does not include government to government meetings held with Native, State, and local governments or briefings to interested organizations.
0354-20	Some assumption in the RMP are incorrect and unrealistic, and a plan based on inaccurate assumptions is doomed to failure, such as: "3) Sufficient funding and personnel will be available for implementation." With only budget cuts on the horizon, this is not only improbable, but impossible.	Please see response to comment 0080-8.
0354-21	Some assumptions in the RMP are incorrect and unrealistic, and a plan based on inaccurate assumptions is doomed to failure, such as: "4) Implementation will be in accordance with all valid, existing rights, federal regulations, bureau policies and other regulations." This does not occur now, and chances look grim for future adherence to regulations.	This is tough to respond to without knowing what specific regulations, bureau policies, and other regulations BLM is not adhering to. We suggest you look at our responses to your comments regarding ANILCA regulations and 17(b) easements for a response to this specific comment.
0354-28	Actions for BLM-managed lands must include: 1) Budget line-items for enforcement of regulations, reparation, and education	A land use plan is an overarching plan that includes decisions on goals, objectives, and allowable uses. It does not contain such detailed information as budget line items.
0354-31	Actions for BLM-managed lands must include: 4) Prioritization of site-specific projects with public input.	Prioritization for implementation level planning will be included in the Final RMP, not the Proposed RMP/Final EIS. This prioritization will be conducted by BLM but will be based in part on the issues identified in the planning process, which were driven by public involvement.
0354-32	Actions for BLM-managed lands must include: 5) Research Agency adherence to applicable laws and regulations (ANCSA, ANILCA, NEPA, Bureau regulations, etc.)	I don't know what "Research Agency" refers to in your comment.
NEPA ADEQUACY		
0084-1	I am very concerned that your plan falls short of giving adequate consideration to alternatives for environmentally responsible federal resource management and fails to take action to provide long-term protection for the remarkable values of these 7.1 million acres of public wild lands.	Alternative C of the Draft RMP/EIS considers designation of three ACECs, one RNA, and five SRMAs for protection of resources associated with these specific areas. Alternative D proposes one RNA, four SRMAs, and takes area wide measures in other areas for resource protection (see tables in Appendix I and II, Draft RMP/EIS). It also identifies Required Operating Procedures and stipulations for resource protection, to be applied to permitted activities.

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	The headwaters of the Copper River watershed, one of the world's richest salmon fisheries, the calving grounds of the Nelchina Caribou Herd, and the pristine Bering Glacier are lands that are important to all Americans.	
0312-35	We are concerned that the Draft RMP/EIS fails to analyze the direct, indirect, and cumulative impacts of recommending rivers as suitable or un-suitable for designation, as required by NEPA. We request that BLM amend the Draft Plan to include an analysis of the specific impacts of designation or non-designation of each eligible river segment upon recreation opportunities, fisheries, wildlife, historic and cultural values, local economies, subsistence, scientific and educational opportunities, and all other significant impacts.	NEPA does not require BLM to consider alternatives in considering WSR suitability. Nor does the Land Use Planning Handbook, which states "Assess all eligible river segments and determine which are suitable or non-suitable per section 5(d)(1) of the Wild and Scenic Rivers Act of 1968, as amended." Based on public scoping conducted during this planning process and based on input from the State, BLM did not feel that it was necessary to generate alternatives around the suitability determination. We received one comment in support of Wild and Scenic River designation during scoping (see Scoping Report).
0312-100	NEPA requires an analysis of the direct and indirect impacts of the proposed activity on the human environment. … [A]t the beginning of the Environmental Consequences chapter, BLM identifies the “critical elements” of the human environment that must be addressed during environmental analysis. See EIS at 364. In its subsequent discussion of the environmental consequences of each alternative treatment of Issue #6, however, BLM utterly abdicates this responsibility, not even identifying a single impact to the human environment as a result of opening up new lands to mineral entry. See EIS at 517-521.	Pages 517 - 521 of the Draft RMP/EIS analyze effects of the different alternatives on oil and gas and mineral exploration and development. The rest of Chapter 4, under sub-headings "Impacts to…from Mineral Exploration and Development" examine environmental effects to other resources, including the critical elements.
0312-102	The cumulative impacts analysis of Issue #6 is similarly flawed. The 2-page analysis of the cumulative impacts of mineral development under the four alternatives contains exactly zero identification and analysis of the impacts to the environment of the increased mineral	Please see response 0312-100. The same applies to the cumulative effects portion of Chapter 4 of the Draft RMP/EIS. Your citation (page 545) refers to the portion of cumulative effects that discusses effects on oil and gas and mineral exploration and development. There is also discussion about cumulative impacts to other resources throughout this section (see for example cumulative effects of mineral exploration and development on wildlife, p. 540, Draft RMP/EIS).

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	entry and subsequent mineral exploration and development that would flow from the alternatives. See EIS at 545-546. Instead, the analysis focuses on the "cumulative impacts to oil and gas resources" rather than on the cumulative impacts to the environment of the proposal to open more lands to mineral entry and the mineral development that would result. This blatantly inadequate analysis is a perversion of NEPA's requirement and must be repaired.	
0323-2	The Draft EIS does not present compelling justification for the conveyance [revocation of PLO 5150] and does not describe effective mitigation of the adverse impacts to subsistence resources and subsistence users in Environmental Justice communities.	Justification will be provided in Chapter 2 of the Proposed RMP/Final EIS (page 119). Mitigation measures would be dependent on negotiations with the State of Alaska and would by highly speculative. Therefore, analysis was conducted based on no mitigation measures for this particular action (which is not a part of the preferred alternative).
0329-2	The Draft EIS/RMP does not evaluate a full range of alternatives. Conservation is not fairly represented, even as an alternative. Alternative C is not proportionally advocating Conservation as Alternative B is to resource extraction. Not even close. Millions of acres would be open to oil & gas drilling and mining, with lax restrictions to boot, under the alternative supposedly slanted to represent conservation. Even if the decision were to open everything to exploitation, still, closing it all to drilling and mining would be a reasonable alternative. If you took a poll of Americans, a good portion of them would no doubt consider closing as much as possible to exploitation. A good portion would do otherwise. They are both reasonable, and the law requires their view to be at least considered.	Under alternative C for leasable minerals, 41% of the area would be closed to leasing. In addition, 33% of the area would be open to leasing, but subject to No Surface Occupancy due to resource constraints (page 130, Draft RMP/EIS). This severely limits 75% of the BLM-managed lands in the planning area to mineral leasing. We feel this is a fair representation of a "conservation" alternative.
0329-3	On many issues, there are no alternatives presented. For example, there are no alternatives for: ROPs, or lease stipulations;	ROPs and stips: One set of Required Operating procedures and stipulations was developed and applied to all action alternatives in order for specialists to write their environmental effects analyses. Wild and Scenic Rivers designation: See response to

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	Wild & Scenic Rivers designation; Conservation of oil & gas, and minerals; A Copper River Watershed ACEC; Bering Glacier Wilderness. The list of "Alternatives Analyzed but Not Considered in Detail," is incomplete. Why isn't there a wilderness alternative in there? Why isn't a Copper River watershed ACEC in there? Our two primary objectives for this RMP are being rejected, without even the courtesy of a formal dismissal.	comment 0312-35. Conservation of oil and gas, and minerals: The draft RMP/EIS does consider alternatives for this; in addition, see response to comment 0329-2. A Copper River Watershed ACEC will be added to the Proposed RMP/Final EIS under Alternatives Considered but not Analyzed in Detail (page 39). Bering Glacier Wilderness: See Draft RMP/EIS, pp. 14 and 15.
0329-4	We are concerned that the Draft EIS/RMP relies on adjectives to qualify impacts, rather than numbers to quantify them. Impacts are commonly described simply as "minor" or "moderate" or "localized," or sometimes "extreme" or "major" or "severe" or "significant," without reference to objective data or analysis. “Conclusory statements which do not refer to scientific or objective data supporting them do not satisfy NEPA’s requirement for a ‘detailed statement.’” Citizens Against Toxic Sprays v. Bergland, 428 F.Supp. 908 (D.Or. 1977). In several important cases, our judgment of the same impacts would be very different. For example, where the Draft calls restrictions on oil, gas & mining development "severe," (p.406) under Alternative C, we'd judge them dangerously inadequate. Another example: where the Draft calls cumulative damage of ATVs on the watershed "minor to insignificant," (p.539), we'd rather agree with the Management Situation Analysis that it is an "extreme concern." Bias in the impact statement, of course, renders impossible the fair and careful evaluation of a project's environmental effects demanded by NEPA." NRDC v. Callaway 389 F.Supp. 1263, 1273 (D.Conn. 1974) citing Calvert Cliff's Coordinating Comm., Inc. v. US Atomic Energy	BLM's land use planning handbook (H-1601-1) states that "land use plans must identify uses, or allocations, that are allowable, restricted, or prohibited on the public lands. The land use plan must set the stage for identifying site-specific resource use levels. Site-specific use levels are normally identified during subsequent implementation planning." Land use plans are broad decisions that are used to set the stage for implementation level decisions that involve site-specific analysis. Consequently, environmental effects analysis tends to be general and sometimes comparisons are made from a relative standpoint. BLM's NEPA handbook (H-1790-1) states that "the analysis should lead to a pointed conclusion about the amount and degree of change (impact) caused by the proposed action and alternatives." This is done in the Draft RMP/EIS.

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	Commission. 449 F.2d 1109, 1115 (D.C. Cir. 1971	
0329-5	The Draft EIS does an inadequate job of considering the cumulative impacts of proposed alternatives. After reading and struggling with this complex plan, we fully understand this is a difficult task. Ironically, however, this is probably the single most important aspect of this EIS/RMP. Because the planning area is a discontinuous smattering of land ownerships in various stages of conveyance or retention, spread over several major watersheds, the most important impacts can only be seen by taking a broader view. The isolated section on cumulative impacts at the end of the document is confusing. (p.536-547) We recommend cumulative impacts be integrated into your consideration of the key issues. Most of our comments regarding cumulative impacts are made that way, but we'd like to point out here that many critical cumulative effects are being ignored. Most important are the Trans-Alaska pipeline system, OHV use on other land ownerships, the devastating logging on the Lost Coast, current exploration for oil and natural gas on Ahtna and state lands, the state gasline spur line Right-of-Way, logging on other land ownerships, the Nevada Star mine, the existence of the World Heritage Site Wilderness and the park, global climate change, and increased industrial tourism. Please consider the interaction of these factors, and the proposed action, in a Revised Draft EIS/RMP. ... The cumulative effects section suffers from the same lack of quantification and analysis as the rest of the document. Impacts are just stated in a vague and general way that does little to inform a	The Proposed RMP/Final EIS will include some of your suggested cumulative impacts discussions, as pointed out in responses to other comments.

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	decision. Please carefully consider cumulative effects in the Revised Draft EIS/RMP.	
0329-6	We strongly recommend taking a watershed approach as the most informative and useful way of considering cumulative impacts. Watersheds are the underlying interconnection of this place, and are in the end of far more significance than artificial political and land-ownership boundaries. You might think you are managing "East Alaska," but you really are managing major parts of the Copper, Susitna, Delta and Bering Glacier watersheds.	Thank you for your comment.
0329-15	The Draft EIS/RMP fails to consider cumulative effects. Critically, the logging on the Lost Coast continues to be ignored. The Draft EIS misleadingly says, "forestry activities are constrained by the Yakataga Game Refuge…" (p.542) Please consider that the state, Mental Health Trust and native corporations have decimated their land on the Lost Coast. This logging covers tens of thousands of acres, and is some of the most damaging in the country. (see exhibit A) ADF&G populations counts show mountain goat populations are down 80% between White River and Icy Bay, as a result of lost winter habitat. We have alerted you to this situation repeatedly, and are puzzled why it is being ignored. Information should be easily available. In fact, BLM may know more about deforestation here than the state does, because of your satellite imagery work.	Vegetation management (including logging) on other lands is considered in the cumulative impacts analysis: "Maximum forest management activities outlined in Alternative B, combined with increased forestry practices and associated road construction in State and Native lands, could lead to short-term reduction in big game security areas, fragmentation of specific habitats, increase in road density, and short-term loss of late-seral habitat in specific areas." (Wildlife, p. 539, Draft RMP/EIS). See also under Fish on page 540, Draft RMP/EIS. Alternatives C and D propose the Bering Glacier area as a Research Natural Area, which would prohibit road construction or timber harvest, unless compatible with protection of the identified resource values.
0329-44	The Draft EIS fails to consider the cumulative impacts of the Copper River Princess Wilderness Lodge, and the introduction of industrial tourism to the Copper basin and Denali highway.	This will be added to the Proposed RMP/Final EIS (page 580).
0329-45	The EIS should consider that the Wrangell St. Elias wilderness is the biggest one in the world.	This is taken into consideration in the Draft RMP/EIS (see cumulative effects analysis (specifically p. 539) and resource assumptions on pp. 362, 363. However, BLM is

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	The attraction here is that big wild, along with the salmon, living native cultures and history. That is what visitors come for. Understanding that context is essential to figuring out how to manage adjacent BLM lands and waters.	mandated to manage for multiple use which is a different mandate than the National Park Service.
0329-190	What are the cumulative impacts of OHVs? Since trails cross multiple jurisdictions, the cumulative impacts are highly relevant. How many mile of OHV trail are there in the Copper River Watershed? In the Gulkana? How many salmon stream crossings are there?	Cumulative effects of OHV management are described on pp. 536 - 547 of the Draft RMP/EIS and particularly under Issue 3, Natural and Cultural Resources, starting on page 538. It is clearly stated in the Draft RMP/EIS that we do not have a complete assessment/inventory every one of the estimated 1,300 miles of trails on BLM-managed lands within the planning area (page 160, Draft RMP/EIS). The Draft EIS/RMP, however, recognizes the need for more intensive OHV management, based on issues and impacts presented in Chapter 3.
0331-1	A full range of alternatives is not offered. For instance, the most land closed to motorized recreation under any alternatives is 4%. Both alternatives C and D close very small percentages of land to summer OHV use. We prefer Alternative C, but 4% is a very modest amount and is not a fair allocation to non-motorized users. OHV riders also have the use of the region's considerable state lands, none of which are closed to summer ATVs, as far as we know. There are no closed areas along the Glenn Highway or Tok Cutoff under any alternative.	BLM feels that a full range of alternatives is considered. While you are correct that only 4% of BLM-managed lands are closed under alternative C, this equates to 281,000 acres. In addition, management intent described in both alternatives C and D clearly show that BLM's intent in most areas is to manage to maintain existing primitive recreation experiences. These are areas where very little motorized use occurs. Currently, 63% of the BLM-managed lands in the area are classified as a primitive recreation experience.
PUBLIC INVOLVEMENT		
0020-11	This [the plan] says that you worked with the Mentasta Tribal Government. I've spoken to our tribal members, none of us recall. I'm on the AHTNA Board, I would have recalled. The only time I recall is when I and Brenda Rebne went and testified before the committee and if that's considered working with you then we need a little bit more involvement in that.	Mentasta Village received a letter (mailed in March, 2003) at the outset of this planning process, describing the process and inviting participation as a government-to-government relationship. Mentasta never replied. Nevertheless, several public meetings were held in the area during the process which could have been attended by people from Mentasta (Slana and Chistochina).
0020-31	We need some cooperative agreements with the village councils and AHTNA, AHTNA is the major land owner in this area. The regulations proposed by both the Federal and the State	The BLM currently has Memorandum of Understandings with Tazlina, Cheesh-na and Chickaloon. We are developing MOUs with Ahtna and several other tribes. Any government entity that would like a more formal, collaborative relationship with BLM is welcome and encouraged to approach us on the subject and work with us to create one.

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	impact our people greatly.	
0026-2	[W]e'd like to see more involvement from the local community in planning of these alternative because we didn't see that we were very involved.	Appendix VI of the Draft RMP/EIS has a complete list of opportunities for public involvement throughout the planning process. The scoping process emphasized local involvement, with two scoping meetings conducted in each local community or village. We also held public meetings at the Draft Alternative stage of the planning process.
0027-2	[T]here is a governing entity in here, it is the village and we do have an MOU with the BLM and I think that should be noted in your overall management plan.	Chapter V has been modified in the Proposed RMP/Final EIS to include a list of government entities that the BLM currently has a Memorandum of Understanding with.
0028-1	First of all I wanted to state that I'm concerned that these hearings are held so soon after the Alaska Resource Management Plan and the Environmental Impact Statement has been given to the public. I did not have time to thoroughly review the report to make comments on it because the report is over one inch thick. So I would have liked more time to read through that and comment on all the seven issues.	The public hearings on the Draft were scheduled to allow as much time after the release of the Draft as possible before the summer subsistence season began. As there were several other ways to comment on the Draft and all were given the same weight, everyone had the same 90 days to review and formulate comments.
0047-1	We felt that not enough information was sent out to the public concerning this plan. We are members of the Alaska Outdoor Access Alliance and were in attendance at the meetings held in Anchorage and Palmer this past week to generate letters in support of Alternative A. There were several people in attendance that still had never heard of this plan and were outraged that more information by your agency was not released in the past.	See response to comment 0026-2. Several meetings were held in Anchorage and Palmer. In particular, one meeting was held during the draft Alternative stage of planning in which approximately 230 people attended, many of whom were members of the Alaska Outdoor Access Alliance.
0069-1	We'd like to encourage your organization to be a little more public in the advertising process. The want ads generally are not read, are not the more favorite parts of the publication that's here locally. Also the timing is not good. I'd like to state that if you were to have held this hearing during the wintertime you would have had a much larger participation and you would have heard a lot more comments on the plan	See response to comment 0026-2. The timing of public meetings is greatly dependent on the planning schedule and timeline. BLM has tried to schedule public meetings at the best possible time of the year within the constraints of the planning process timeline.

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	from those in the industry that I represent.	
0080-5	Further be it resolved, the Southcentral Regional Council recommends that BLM encourage cooperative agreements (or memoranda or understanding) with local tribal entities and land owners to resolve land management issues, and to improve/protect habitat through actions such as prescribed burning.	See response to comment 0020-31.
0164-3	Native Villages are recognized as sovereign entities by Federal law. The Final RMP needs to refer to all Native Villages as tribes and consider them to be a government to government relationship with BLM.	Changes have been made so that the proper reference is made throughout the Proposed RMP/Final EIS.
0164-6	The Final RMP must list specifically which entities the BLM consulted with during the development of this planning document.	Appendix F of the Draft EIS/RMP contains such a list.
0164-19	Ahtna Inc. requires a cooperative agreement to manage ATV use on all lands within the planning area.	A cooperative agreement in the form of a Memorandum of Understanding is currently being developed between BLM, Glennallen Field Office and Ahtna Inc. Cooperation and consultation with Ahtna, Inc. relative to ATV management will be addressed through this agreement.
0164-70	Ahtna. Inc is in support of a cooperative agreement with the BLM to facilitate cooperative management, data sharing, and open communication about issues on Native-selected lands and those BLM lands have had an impact on Ahtna Inc. lands. We support cooperative agreements between BLM and Tribal governments in the Ahtna region.	See response to comment 0020-31.
0323-5	EPA recommends that the Final EIS include additional description of not only the outreach efforts that BLM conducted during the planning process, but also how the information and comments that were submitted to the BLM were received, evaluated and used to develop the final Preferred Alternative. This additional information will inform the public about the	Public Participation opportunities are described in Chapter V of the Draft RMP/EIS. In addition, a specific list of public meetings is shown in Appendix F. The Proposed RMP/Final EIS will contain an Appendix J that shows the public comments received on the Draft RMP/EIS and how BLM responded to them; it will also highlight changes between the Draft and Final as a result of public comment.

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	process the BLM undertook to evaluate and respond to concerns and recommendations that were submitted to the BLM during the Draft EIS comment period and government-to-government consultation. As an example, BLM could highlight or footnote in the Final EIS those major components of the final Preferred Alternative that directly respond to comments, issues and concerns expressed by tribes during consultation.	
0323-6	The Final EIS should include a section or appendix that contains comments received during the Draft EIS public comment period and BLM's responses to those comments, with user-friendly cross references to locations within the final document where additional information was inserted or changes were completed in response to comments.	This is included in the Proposed RMP/Final EIS as Appendix J.
0323-7	In addition, EPA recommends that the Final EIS also include the East Alaska Resource Management Plan Scoping Report as an appendix for easier reference by the reader.	The scoping report is available upon request from the BLM office as well as on the Plan website. Pages 7-8 of the Draft RMP/EIS outline how the input received during scoping was used to generate the issues and alternatives that have shaped this planning process. In an effort to keep the Final as concise as possible we did not include this as an Appendix.
0354-27	BLM's management policies must reflect more oversight on: 5) Work with Village Councils / Native Corporations for management strategies on 17(b) easements that reduce negative impacts.	As noted on page 563 of the Draft RMP/EIS, scoping meetings were held with all villages within the planning area as well as Ahtna Native Corporation. From those meetings, Memorandum of Understanding (MOUs) with several villages were established. More MOUs are currently in the development stages. Meetings were also held with villages of the planning area at the Pre-Draft Alternative stage and the Draft Stage. Appendix F of the Draft RMP/EIS has a complete list of opportunities for public involvement throughout the planning process.
0397-2	And the final RMP, that needs to be--needs to refer to all Natives as tribes and consider it to be a government to government relationship.	Refer to response to comment 0164-3.
0380-4	And so from there I think that we need to do a government to government with the tribes, with the corporation and with the Feds and the State, we need to work out some kind of protection for the hunting and fishing.	See response to comment 0020-31.

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0381-1	Anyhow, as a representative of Cheesh'na, I urge BLM to reflect in the plan, let's just say plan, that we, the Native villages within the AHTNA region, for instance, must be referenced as tribes. Federal law recognizes us as such and it serves as a basis for a government to government relationship. Given this, we urge BLM to actively seek cooperative agreements with the tribes because it not only serves to benefit both parties but also could be used as a management tool in getting Congress to appropriate funds or otherwise implement and enforce the RMP, the plan.	Refer to responses to comments 0164-3 and 0020-31.
NEW ALTERNATIVES PRESENTED		
0006-14	I have only recently learned of a proposal for a Copper River Valley ACEC; I hope BLM will give this proposal serious consideration.	See response to comment 0186-1.
0035-2	[I] proposed special recreation management area southeast of Valdez. ... I would like to see that special management area managed for non-motorized use, especially with reference to helicopters and snowmachines. And I was just skiing through that area about three weeks ago and it was my understanding that the Chugach Forest Plan had designated the country south of Solomon Gulch as non-motorized and we came across snowmachine tracks throughout the Jack River, or the Neamhoff River drainage and that was a real disappointment.	This area would be considered for designation as part of the Tiekel SRMA under Alternatives C and D (under long term management in D). Because of the small parcel size of BLM lands in your specific area, it is not considered for exclusion from heli-ski activities in decisions made as part of this RMP.
0038-1	And so the designation now of having trails and only staying on the trails, I am totally against. What I would rather see is corridors. I think Alaska is big enough to have motorized vehicles, for having non-motorized vehicles, for having wilderness, it's a big enough state to satisfy everybody. When there is core areas for motorized vehicles, we need to have more area, we need to have not a designated trail,	Your suggestion will be considered in implementation level planning, in consideration of such things as game retrieval using OHVs off of existing or designated trails. Thanks for the suggestion.

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	but designated corridors, one mile or two miles each side of the corridor, then you're basically able to go wherever you want.	
0041-1	I support expanding the areas for non-motorized users. There should be plenty of places where OHVs and snowmachines are not allowed. One good place to consider making "quiet recreation" would be the McCallum Creek drainage.	Please see response to comment 0042-1.
0042-1	I like to think that there is room in our big state for all kinds of recreational users, and it would be nice to have some of the beautiful Delta Range left undisturbed for skiers and climbers without having to run into snow machines. I do a lot of skiing, and I find it peaceful and refreshing, and there is nothing more wonderful than being able to go out in the wild and break trail. But it is difficult to enjoy it when I am constantly either going by snowmachine trails or hearing the mosquito-buzz of the machines in the distance, or even dealing with the fumes of machines that have just gone past. This is a very large area, and a very large area is open to the machines. It seems to me we could share the area a little more effectively. For example, I would support adding the McCallum Creek drainage to the areas designated for quiet recreation.	Based on public comment, the Draft RMP/EIS has been revised to include the McCallum Creek drainage in the Canwell sub-unit of the Delta Range SRMA (pp. 52 and 73, Proposed RMP/Final EIS). This area would be managed for non-motorized winter recreation, with allowances for snowmachine use to access subsistence hunting.
0045-3	These two areas, among others in the area, have seemed to be receiving less and less snowpack over the years, from my observations, therefore I recommend you add McCallum Creek drainage to the list as a third as a third area designated for quiet recreation.	Please see response to comment 0042-1.
0047-2	We support alternative A to be compatible with the states generally allowed uses and feel that it would be the least restrictive of all the alternatives listed.	Thanks for the comment. BLM will not amend alternative A in the Proposed RMP/Final EIS as you suggest because NEPA requires analysis of a "No Action" alternative. However, your amendment suggestion is considered and analyzed in other alternatives in the Draft RMP/EIS, specifically Alternatives C and D consider adoption of policy

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		consistent with the State's Generally allowed uses for State-selected lands.
0049-1	[W]e would like to see from a practical perspective, an Alternative E, if you will, in which 100 percent of the lands would be managed to match the State's generally accepted used as defined in Alaska Administrative Code 96.025. And what this would do for us is give us an option that we feel would have a chance of being blessed by the State. would feel much like we're already used to in terms of the way we currently use the lands. The way that works is that -- well, again, probably a clarification, where in Alternative C and D it says that it would be limited to existing trails, and that would be the equivalent of the generally accepted uses, we would like that language to emphasize that those users of those lands could get off trail as long as they don't destroy the vegetation which, again, is consistent with the State designation for State lands. In particular, lands that are already conveyed to the State.	Please see response to comment 0047-2. In addition, please note that policy adopted by BLM for State-selected lands under Alternatives C and D would allow for travel off existing trials, if that travel did not result in resource damages as described on page 36 of the Draft RMP/EIS.
0050-1	I support adding the McCallum Creek drainage to the non-motorized areas because it is road accessible to skiers yet not in a snow shadow on the north side of the Alaska Range.	Please see response to comment 0042-1.
0060-7	Alternative C provides the BLM with the opportunity to plan the remaining 2,915,000 acres to the best possible ecological advantage. While Alternative C provides for the protection of the Nelchina ACEC, all segments of the WSR including the sections of the Delta, the Western two thirds of the Bering RNA, lands within the transportation and utility corridor (PLO 5150), the Tiekel SRMA, and the lands within the West Fork ACEC, it is suggested that the remaining concentration of land be put towards ensuring wildlife corridors,	Your considerations are taken into account in management actions described in the Preferred Alternative (for wildlife corridors, riparian and woodland health, and ecological diversity). See specifically the proposals under vegetation management (pp. 113 - 121, Draft RMP/EIS) and the Required Operating Procedures and stipulations that will adopted under all action alternatives (Appendix III).

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	riparian and woodland health, and ecological diversity.	
0060-19	While we appreciate and support the Canwell and Augustana subunit closures to motorized use in the preferred alternative, we are disappointed to note that all areas in the range that receive heavy snowfall are currently open to snowmachine use, while the areas proposed for closure are in the snow shadow of the Delta Range and commonly get little snow. … The McCallum Creek area on the south side of the Delta Range should be added to the non-motorized category, because is located in a particularly snowy side of the Delta Range, ideal for back country skiing and non-motorized recreation, and would correct the imbalance.	Please see response to comment 0042-1.
0060-23	Several other areas should be considered for seasonal closures [to off-highway vehicle use]. Specifically, closures should be instituted during nesting season in the West Fork Gulkana ACEC and other areas of primary Trumpeter Swan habitat. Seasonal closures should also be instituted in important calving areas for bison, caribou, and moose, sheep, and mountain goats. Since spring travel tends to be most destructive in terms of erosion and bogging, spring closures would also help protect ecosystems as a whole.	Seasonal closures or limiting OHV use to designated trails are considered for these areas in alternatives C and D. See pages 34-50 of the Draft RMP/EIS and also the tables in Appendices A and B.
0062-1	As I have pointed out in the past there is a snow shadow effect in the Delta Mountain with significantly more snow on the south side of the Alaska Range. The Augustana, Castner, and Canwell glaciers commonly have significantly less snow. Adding the McCallum drainage to the non-motorized zone appears desirable due to the following reasons: 1. the drainage is almost entirely BLM; 2. the area is close to the road so non-motorized users have easy	Please see response to comment 0042-1.

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	access; 3. It is an area traditionally used by skiers and mountaineers. (In fact it was the area we retreated to when we were driven out of the West Gulkana, Gulkana, and College Glaciers by the snowmachine invasion); 4. It is on the south side of the range so it gets good snowfall; and 5. motorized users have access to many square miles of similar terrain with their ability to travel further. Please close the McCallum drainage to motorized use.	
0077-1	The McCallum Creek drainage should be added as another quiet recreation area.	Please see response to comment 0042-1.
0078-2	[I]n addition the McCallum Creek drainage would be a place that would also be good because unlike the other places mentioned [Castner, Fels & Augustana glaciers] that get much smaller amounts of snow. The McCallum gets decent snow falls.	Please see response to comment 0042-1.
0079-4	[A]t a minimum, [we] urge BLM to include the McCallum Creek drainage as part of the Cantwell subunit in its Final Plan. This area is proposed by longtime skiers with great familiarity with the entire area, for the reason that its location on the south side of the Delta Range makes for a reliable snowfall. It is their experience that the areas proposed for closure are in a snow shadow of the Delta Range and commonly lack adequate snowfall.	Please see response to comment 0042-1.
0097-7	To alleviate the very real probability of continued trail and environmental damage to the East Alaska lands, we urge BLM to adopt a policy as part of its final decision that Limited means limited to existing trails. (This designation is already in place in the Preferred Alternative for the Delta and Gulkana WSR Corridors.) This standard would serve a number of purposes: put everyone on notice that upon Plan approval, OHV use is being	We agree and the intent of the preferred alternative (D) is to limit OHV users to existing or designated trails. However, in order to designate trails in any given area and enforce no OHV travel off of designated trails, the following must occur: a) complete inventory of all existing trails in the area; b) determination of which trails are necessary based on public input, providing for subsistence, recreation, resource development, etc; c) publishing the designated trails in the Federal Register; and d) enforcement. BLM recognizes that it is not ready for that level of detail in this RMP decision. Therefore, it must set the stage in this RMP and prioritize areas for implementation-level planning. Logically, the first priority is for areas that we know we will manage long-term. In the meantime, BLM will increase it's OHV management on other lands (such as State-

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	managed throughout the East Alaska area: stop some of the trail proliferation and resource damage; provide an unambiguous basis for enforcement; permit enforcement to be initiated since we understand a substantial amount of the trail mapping will have been completed by time of Plan approval, and, of course, provide some protection for the land until implementation planning is completed.	selected lands) through education and enforcement.
0159-3	It is strongly recommended that an additional area on the south side of the Delta Range, the McCallum Creek drainage, be closed to snowmachines. That is the snowy side of the range and, prior to being displaced over the years by the increasing snowmachine traffic, this area was extensively used by backcountry skiers.	Please see response to comment 0042-1.
0164-41	The Nelchina Caribou Herd migrates through the Eureka Area in the spring. Ahtna Inc. would like to see protection of this resource from oil and gas leasing, mineral entry, and snowmachine and ATV recreational use.	The four townships of land in this area are selected by the State of Alaska and by Ahtna, Inc. Consequently, no mineral development would occur on these lands until they are conveyed to the selecting entity, at which time it is their decision whether or not to allow mineral development; or 2) the selections are relinquished and the lands are retained in long term federal ownership. The State of Alaska has indicated these lands are a high priority for conveyance, so relinquishment is doubtful.
0164-45	The Clearwater Mountain are a traditional hunting area of the Ahtna People and should be protected for fish and wildlife resources and subsistence uses.	The Clearwater Mountains, north of the Denali Highway, have been conveyed to the State of Alaska. They are now State lands. This RMP will not prescribe management for those lands.
0186-1	"…the waters contained on public lands provide a tremendous service in that they are the spawning and rearing areas for these fish stocks." "There is a direct correlation between the amount of quality habitat and fish populations."- I quote from the BLM Draft EIS. ...I wish to see the alternative to consider the Copper River watershed an Area of Critical Environmental Concern (ACEC) reinstated.	A Copper River Watershed ACEC was considered during the planning process, but was eliminated from detailed analysis for the following reasons: a) BLM currently manages only approximately 15% of the lands within the watershed, 50% of which are selected lands that will probably not be retained under federal management; b) strong protective measures will be continued along the Gulkana River, BLM's largest piece of unencumbered land in the watershed, through the proposed SRMA designation and continued management as a Wild and Scenic River; c) protective measures will be put into place through measures identified for the West Fork area and the Tiekel SRMA (see tables pp. 598 and 583); and d) application of ROPs and stips for permitted activities apply strong protective measures for anadromous streams. This information will be added to the Proposed RMP/Final EIS under "Alternatives Analyzed but not Considered

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		in Detail (page 39)."
0312-8	The three conservation proposals for lands within the Delta Range are specifically the Delta Bison ACEC, the Delta Wild and Scenic River corridor SRMA, and the Delta Range SRMA. It is not a coincidence that the values of these lands continue to emerge throughout the draft plan. Obviously BLM Resource Specialists have both independently and collectively identified outstanding resource values and illustrated their willingness to commit protective management strategies toward long-term conservation. We recommend that the preferred alternative of the Final East Alaska RMP include a single proposal to recognize and protect the wildlife values and non-motorized recreation opportunities available in the Delta Range region.	Good idea. The areas are proposed as is because of different mandates and policy (for example, one area was withdrawn as a pipeline/utility corridor, one area is a Wild and Scenic River). However, they may be combined in implementation-level planning.
0312-16	We support Cascadia Wildlands' nomination to designate the BLM-managed lands and tributary streams within the Copper River Valley as an Area of Critical Environmental Concern (ACEC). The world renowned salmon fishery of the Copper River Valley is currently experiencing increasing impacts from human encroachment, unmanaged use of recreational off-highway vehicles (OHVs), and the potential for increased mineral development activities and infrastructure on adjacent BLM lands. The salmon spawning streams on BLM-managed lands should be avoidance areas for mining activities and OHV use should be limited to existing or designated trails and stream crossing points. We support an ACEC designation for the Copper River watershed that will not necessarily prohibit mining activities or OHV use, yet serve as a reminder	Please see response to comment 0186-1.

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	in BLM permitting and management decisions of the sensitive fisheries habitat and BLM's responsibility to mitigate any impacts that could diminish water quality or downstream resource condition, increase erosion, or threaten the economic viability of the commercial salmon industry.	
0312-52	We support a combination of the allocations within Alternatives C and D regarding VRM classifications. The designated corridors of the Delta and Gulkana Wild and Scenic Rivers must be assigned VRM Class I to protect the outstandingly remarkable scenic values for which these rivers were designated. The landscapes adjacent to the designated corridors, especially the uplands visible from the rivers, should be assigned VRM Class II in order to minimize visual impacts and ensure a naturally harmonious scenic viewshed for users.	Thank you. Your recommendations are considered as part of the preferred alternative (D). See page 99, Draft RMP/EIS. There is limited Class II along the southern portion and the west fork of the Gulkana because the viewshed from the river in these areas is limited.
0312-93	Maintaining the ANCSA d(1) withdrawals within areas that should be recognized for special resources will afford the maximum protection for resource vales. The following d(1) withdrawals should be maintained against mineral leasing and locatable mineral entry: 1. PLO 5179 on the unencumbered BLM lands within the Bering RNA 2. PLO 5179 which provides the “outer corridor” on the Gulkana Wild and Scenic River. 3. ANCSA d(1) withdrawal within the Nelchina ACEC. 4. Modify PLO 6329 to exclude leasable minerals from West Fork ACEC 5. Modify PLO 5180 to exclude leasable minerals and mineral entry within the proposed Denali Highway SRMA. Generally, maintain ANCSA d(1) withdrawals in the following areas within the planning area: • Areas containing identified sites of subsistence,	Your suggestions are considered in alternative C of the Draft RMP/EIS, with the exception of Wild and Scenic Rivers. Please see responses to comments regarding Wild and Scenic Rivers in this Appendix.

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	cultural or historical importance. • Designated, suitable, and interim protected Wild & Scenic Rivers. • Lands classified as VRM class I and II.	
0321-1	We would like the fisheries section of the plan reinstated, including an alternative to consider the Copper River watershed an Area of Critical Environmental Concern. Commercial fishing of Copper River seafood is an important economic, environmental and cultural resource which relies on the health of these lands.	Fisheries are addressed in the Draft RMP/EIS, on pp. 244 - 251 in Chapter 3 and pp. 461 - 477 in Chapter 4. For the Copper River ACEC proposal, see response to comment 0186 - 1.
0326-3	The Implementations-Level Planning section for both Alternative C and D will require the significant expenditure of time and funds in the attempt to designate areas and trails as “limited” or “closed. In contrast, Alternative A, based on the Southcentral Management Framework Plan (MFP), is the only alternative plan that would not require an inventory of all trails within the planning area. For these reasons, plus the fact that after land conveyances the majority of the EARMP area will be under state management, AOC supports Alternative A with the following amendments: 1.Revising Alternative A to match the State of Alaska’s “Generally Allowed Uses on State Land” policy. This policy has a long record of adequately protecting state lands and will allow consistent enforcement between state and federal lands; 2.Revoking all ANCSA d(1) withdrawals, except within the already designated Delta and Gulkana Wild and Scenic River corridors and PLO 5150 (page 107 Alternative B, withdrawals.)Dual management of subsistence hunts in GMU 13 has been a continuous issue since federal managers developed subsistence regulations of their own. Conservation goals and law enforcement	Thanks for the comment. BLM will not amend alternative A in the Proposed RMP/Final EIS as you suggest because NEPA requires analysis of a "No Action" alternative. However, your amendment suggestions are considered and analyzed in other alternatives in the Draft RMP/EIS, specifically: 1) Alternatives C and D consider adoption of policy consistent with the State's Generally allowed uses for State-selected lands; 2) Alternative B considers revocation of all ANCSA d(1) withdrawals; and 3) Alternative B considers revocation of PLO 5150, which would allow State conveyance to take place, therefore eliminating the federal subsistence hunt in the pipeline/utility corridor. It is possible to combine elements from each alternative in the final decision presented in the Record of Decision.

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	of state hunting regulations would be much easier to achieve without federal hunting regulations applying to 1.5 million acres out of the 7 million in the planning area; 3. The construction of recreational facilities (under Alternative B, page 57) for the Denali Highway Area would be highly favored by the AOC. The AOC believes the vast majority of outdoor recreational users are law-biding citizens who are cognizant of environmental issues and they would appreciate outhouse facilities, garbage receptacles, and campground/boat-launches.	
MAPS		
0173-2	The Management Alternatives maps still do not have any references to allow the reader to determine exact locations of the proposed areas of management. They are missing: Township, Range, and Section lines; the Yost Trail is not identified on the maps. This is one example of a well establish [sic] trail that has been missed in the inventory. Are they others like this?	All maps within the document contain longitude and latitude lines, key location towns, larger river systems and lakes, as well as the main highways as reference points. The maps are not meant to portray exact locations and cannot because of the scale required to show the entire planning area on one page. Township and section lines are too detailed and would clutter the maps. We have included the main meridian lines, glaciers, and more towns, rivers, and roads as reference points.
0173-3	All active State and federal mining claims should be shown on at he maps. This will allow the reader to understand the impact on existing mineral exploration programs for the Alternatives. This would also allow local communities and businesses to assess the financial impact the Alternatives might have on their businesses. This data is readily available in electronic geospatial form for both State and BLM claims.	See response to comment 0355-7.
0173-40	All 17(b) access routes should be shown on the Plan with their identifying name and number.	See response to comment 0355-11.
0173-41	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	See response to comment 0355-11.

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	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.	
0354-6	On (p. 163, map 24) the maps require more detail as no one can determine which 17(b) easement, in an area full of illegal trails, is being referred to. This only increases conflicts.	See response to comment 0355-11.
0354-7	The printing of the "alleged" RS 2477's is offensive to those of us (native Corporations and Tribal Councils) who DO NOT recognize them. BLM needs to refuse to acknowledge their existence and REMOVE THEM FROM THE MAPS, as printing them only increases conflicts and trespass issues, along with the associated costs, liabilities and litigation.	The R.S. 2477s have been removed from Maps 3 and 4 but not from Map 27 in the Proposed RMP/Final EIS. The following disclaimer has been added to Map 27: "RS-2477 routes portrayed on this map are for informational purposes only. These routes have not been adjudicated or asserted. The routes shown are based on historical or traditional trails, but because of lack of regular maintenance or use, many routes may no longer exist on the ground. These mapped routes DO NOT imply that a trail actually exists or that access is currently available. Consult with local land owners and managers before attempting to use the RS-2477 routes shown. "
0355-2	References are needed to assist the reader to better determine exact locations. Longitude and latitude are often the only reverence on many of the maps. We suggest that more reference information be added to include: township lines, place names for roads, towns, sites, lakes, etc. milepost references.	See response to comment 0173-2.
0355-3	All federal withdrawals including PLOs, secretarial orders, congressional acts, etc should be identified on maps.	Accurately portraying all PLOs, secretarial orders, and congressional acts on maps would result in a map that would be very complex and difficult to interpret. The effect of all PLOs, secretarial orders, and congressional acts is portrayed on the mineral alternatives maps 19-26 in the Draft RMP/EIS by showing which areas are open or closed to mineral development.
0355-5	State and Native selections should be identified in the EARMP and shown on the maps. These lands will likely be taken out of BLM management and it is important that everyone using the EAMP [sic] know that these selected lands will in all likelihood become State and Native owned lands at some point in the future.	Land status information is portrayed on all maps where it does not impede the understanding of the other information presented on the map. Acreages and explanations of land status within the planning area are described within Table 1 and in the narrative on pages 4 and 5 of the Draft RMP/EIS. Because of the large amount of selected lands within the planning area, for many alternatives interim and long-term management objectives are outlined. The role selected lands play within this planning area is clearly shown and considered throughout the document.
0355-7	Active State and Federal mining claims should be shown on the maps.	Federal mining claims have been added to the maps in the Proposed RMP/Final EIS dealing with mineral potential and the minerals alternatives. See maps 20, 21, 23, 25,

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		and 51. This information will not be included on all maps because it does not pertain to the subject portrayed on all maps and would confuse the reader. State mining claims are not under BLM jurisdiction and are therefore not shown.
0355-9	A mineral occurrence map should be developed for the area and included in the Plan. This map should show all locations where mining has occurred in the past. This information is available through the USGS and the BLM minerals office.	A discussion of mineral occurrence and past mineral development is included in Chapter III on pages 325-337 of the Draft RMP/EIS. Maps 48, 49 and 50 of the Draft RMP/EIS display the mineral occurrence for coal, oil and gas, and minerals. A more specific description of the location of sites developed in the past is included in the discussion.
0355-10	All sedimentary basins should be shown and identified for their petroleum potential.	A description of sedimentary basins in the area is included on pp. 330-331 of the Draft RMP/EIS. These basins are shown on Map 50, page 333.
0355-11	All roads, trails and historic access routes should be shown an 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 they are currently recognized by the State. An appendix should be included giving a comprehensive list of all trails of every type. … Map 24 showing trails should identify each trail and include a table with names and number of each trail.	Because of the map scale required to show the entire planning area, the level of detail needed to identify specific trails or 17(b) easements on the ground is not possible. A detailed list of all trails and 17(b) easements is available from the Glennallen Field Office. A disclaimer has been added to Map 27 of the Proposed RMP/Final EIS: "RS-2477 routes portrayed on this map are for informational purposes only. These routes have not been adjudicated or asserted. The routes shown are based on historical or traditional trails, but because of lack of regular maintenance or use, many routes may no longer exist on the ground. These mapped routes DO NOT imply that a trail actually exists or that access is currently available. Consult with local land owners and managers before attempting to use the RS-2477 routes shown. "
0355-13	All PLOs, including those along the inner and outer pipeline corridor, should be shown on the maps and identified by number and acreage.	A Table with the PLOs identified by number with their acreages has been included in the Final in Chapter III under Lands and Realty. The effect of these PLOs is displayed by alternative in Maps 17-23 of the Draft RMP/EIS. PLO 5150, which makes up the transportation and utility corridor, is identified on Map 41 of the Draft RMP/EIS. Acreages have been added to that map for both the inner and outer corridors.
0355-15	Map 1 and several other maps incorrectly identify BLM "unencumbered" lands when much of these lands are adversely encumbered by lingering withdrawals, PLOs, etc.	The Glossary, on page 696 of the Draft RMP/EIS, defines the term unencumbered as: "Public lands that have not been selected by the State or Native organizations. These are the lands that will be retained in long-term Federal ownership." The term is not used to describe specific limitations on a use of the land, only general land status.
0355-31	The red line boxes on Maps 19,21,and 23 that are meant to indicate areas open to mineral entry are not clear in some areas. It appears that these boxes may be areas that are NOT open to mineral entry. For example, WSR areas and Native-selected lands have red	These maps have been revised in the Proposed RMP/Final EIS for clarification. See maps 19-26 in the Proposed RMP/Final EIS.

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	boxes around them. It is crucial that such issues be corrected or clearly explained in the EARMP to minimize the future confusion and lessen the opportunity for legal challenge.	
0355-32	Map 48 regarding Mineral Terranes and Producing Placer Districts is a valuable addition to the EARMP. However, this base information and the active mining claims should be included with the discussion of each Alternative to show the impacts of mineral closures and restrictions to access associated with each Alternative. Furthermore, this Map 48 should be placed at the beginning of the discussion to ensure that it is included in the minds of the reviewers from the start.	Map 48, which depicts Mineral Terranes in the Draft RMP/EIS, is located directly after the narrative discussion of mineral terranes. We feel this placement is consistent with how maps have been located throughout the document and is an effective way to portray the information.
EDITORIAL CHANGES		
0164-4	The Final RMP should refer to Mt. McKinley as Mt. Denali.	The McKinley reference is consistent with the portrayal on USGS maps. For consistencies sake, BLM will use names accepted by the USGS for location names.
0164-40	Page 249 - Table 22 - The title of this table is misleading … It should be "Subsistence and Personal Use Fisheries Permits Issued and Harvested".	This change has been made in the Proposed RMP/Final EIS.
0175-9	The definition of public lands in the Federal Land Policy and Management Act (FLPMA) contrasts with the definition of public lands in ANILCA. Except for Titles IX and XIV of ANILCA that amend the Alaska Claims Settlement Act and the Alaska Statehood Act, ANILCA uses a definition of federal public lands that applies to many management directions regarding public uses of federal land. For purposes of the ANILCA provisions, the FLPMA definition must be replaced by the ANILCA definition in Section 102, which states: (2) The term “Federal land” means lands the title to which is in the United States after the date of enactment of this Act. (3) The term “public lands” means land situated in Alaska,	BLM will continue to use the FLPMA definition of public lands.

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	which, after the date of enactment of this Act (December 2, 1980), are Federal lands, except – A) land selections of the State of Alaska which have been tentatively approved or validly selected under the Alaska Statehood Act and lands which have been confirmed to, validly selected by, or granted to the Territory of Alaska or the State under any other provision of federal law; . . . Because the definition of public lands is important to determine where provisions of ANILCA versus FLPMA apply to federal lands in Alaska, we request the Bureau incorporate the ANILCA definition of public lands in the plan and carefully distinguish where the plan uses the FLPMA definition.	
0175-34	Page 149, b). Please correct item three to read: "Monitor Resource Populations Use(d) for Subsistence Purposes."	This change has been made in the Proposed RMP/Final EIS.
0175-40	Page 249, Second full paragraph, line 3. Please change "residence" to "residents."	This change has been made in the Proposed RMP/Final EIS.
0355-27	It appears that on page 61 regarding the Management Comment to all Alternatives should reference page 73 not page 56.	The reference to page 56 of the Draft RMP/EIS is correct as it is referring to Management Common to All Alternatives for Issue 2: Recreation (containing management for the Gulkana WSR Corridor Area) and not Issue 3: Natural and Cultural Resources.

9. GENERAL/OTHER

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GENERAL (CROSSING MULTIPLE CATEGORIES)		
0010-4	We believe under ANILCA the Federal government is obligated to protect the state of Alaska's Native's fishing and hunting. We strongly believe that and I believe it's pretty well outlined in ANILCA.	Page 149 of the Draft RMP/EIS describes BLM's administrative functions in regard to subsistence management, including compliance with ANILCA Section 810. This is also clearly explained on pp. 342 and 343. Chapter 4 (pp. 522 - 535) displays the effects of implementation of the different management alternatives on subsistence (and socio/economics) and Appendix V is the ANILCA 810 analysis, considering impacts of the different management alternatives on subsistence.
0010-9	Some of the other concerns we have is on navigable waters, that these navigable waters are used to access lands that are private. We have concerns about--AHTNA, Inc., has a lot of lands out in the middle of nowhere here up rivers and we can't watch all of them, so I mean those thing ought to be considered before access is allowed.	See response to comment 0312-97.
0020-1	What needs to be added in your vision is the protection of neighboring lands and shared resources. We, as AHTNA and Mentasta people, I have testified before, you've heard, we are a good neighbor to BLM. We are a good neighbor to the Park Service and the State of Alaska. We don't let people, you know, cross through land with off-road vehicles, we don't encourage trashing. What we are asking is for your to be a good neighbor back, especially on these trails issues. So if you can add part of your vision to protect, or at least the shared resources need to be protected, something has to go in there.	Alternatives C and D define the Cantwell-Chistochina Travel Management Area (Draft RMP/EIS, pp. 40, 47) which outlines more active cooperation with Native entities regarding OHV use on Native-selected lands. A Goal of Travel Management is to: "Manage trails to minimize resource impacts and reduce user conflicts."
0020-9	There is not much management put into the protection of Native allotments. We have easements crossing Native allotments, which is forbidden. We need to get those dealt with.	This RMP will not affect disposition of Native allotments. Native allotments are described in pages 289 and 290 of the Draft RMP/EIS.

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0020-13	There's no justice here. And I think it all starts with policy. If your policy included that, somehow there would be--you can't teach respect but maybe you can establish a guideline where the respect is built in.	No, we can't establish a guideline, law, or regulation that requires respect. We can, however, educate the public about specific issues (17(b) easements in particular).
0020-19	The land--back to the Native lands, sorry. BLM's policy is to retain them in long-term Federal ownership, that scares me. That lets me know you have no incentive at all to transfer those lands to Natives. And you're not managing them or protecting them so what's going to happen? They must be transferred either to the State or Natives sooner if you're not going to protect them, they're just increasing in the contamination up there.	The land conveyance process is an issue out of the scope of this plan. See the Draft RMP/EIS, page 13. All land entitlements will be fulfilled as outlined in the Land Transfer Act which is an independent process from this plan.
0034-3	People having access to other lands via the rivers because they're navigable or getting to the lakes because they say the lakes are navigable and then they demand rights to get to that lake because they -- it's State owned, you know, it's State navigability. It's not addressed in the plan adequately.	See response to comment 0312-97.
0073-1	I would like to go on record as supporting the BLM preferred alternative D. I think it is always important to try to find a balance between development and conservation, particularly in a large area with multiple users and uses.	Thank you for your comment.
0075-1	The Council recommends selection of either alternative C or Alternative D of the East Alaska Resource Management Plan. These two alternatives strike an appropriate balance between protection of important common property resources and allowing use of renewable resources to take place.	Thank you for your comment. The final Record of Decision can incorporate elements of both Alternative C and D.
0164-22	The navigable waters issue as a method of accessing public lands is not adequately addressed in this Draft Plan and BLM needs to do so.	See response to comment 0312-97.

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0164-67	We oppose Alyeska issuing permits within the pipeline utility corridor which allow access to Ahtna lands without management of trespass from State and Federal governments or Alyeska.	Decisions made in this planning process will not affect Alyeska's enforcement on the pipeline. Such issues should be worked out cooperatively between Ahtna, Alyeska, and the Joint Pipeline Office.
0173-10	Delta Bison Calving Area: This area is not truly "critical" and should not be designated as an Area of Critical Environmental Concern (ACEC) habitat as recommended under Alternative C and D. … Alternative C is unjustified and should not be adopted. BLM must manage its lands for multiple use. This alternative further restricts multiple use.	The Delta Bison Calving Area is only designated as an ACEC in Alternative C (see pages 80 and 83, Draft RMP/EIS). Evaluating this area as an ACEC within the range of alternatives does not restrict multiple use of BLM lands within the planning area. The definition of "multiple use" is shown on page 687 of the Draft RMP/EIS.
0283-1	I recommend that Alternative "A" remain in effect. Alaska is a land of diverse habitat, topography and opportunity. There are currently dozens of millions of acres that are restricted for public use. Leave what we have now alone for public use at all levels. I support Alternative A because it represents a no nonsense, common sense approach to land use.	Thank you for your comment. Alternative A is evaluated throughout the range of alternatives presented within the Draft RMP/EIS.
0312-97	We request that the Proposed RMP/Final EIS addresses the impacts of the State navigable waters issue as a method of accessing public lands. The Draft RMP/EIS does not adequately assess this issue.	Decisions made as a part of this RMP process will not affect navigability determinations made as conveyance of State and ANCSA entitlements are fulfilled. However, since navigable waters are a major means of access in the state and within this planning area, the Proposed RMP/Final EIS will include a discussion in Chapter 3, under the Travel Management Issue, Access.
0331-4	Lands along the Tok Cutoff are neglected; there are no special areas set up, no values given special protection.	The lands along the Tok Cut-off, which are State- and Native-selected, are included in the Cantwell - Chistochina Travel Management Area under Alternatives C (Draft RMP/EIS, page 40) and Alternative D (Draft RMP/EIS, page 47), which emphasizes working with the Native communities to manage OHV use and impacts. This area also falls into the Extensive Recreation Management Area, see page 64.
0355-6	Navigable waters should be defined in the plan per the Gulkana decision and so identified.	See response to comment 0312-97.
0355-14	Table 1 on land status appears to have an error under the section of BLM administered lands. How can "Dual-selected" land be 2,100,000 acres while native-selected land is	Table 1 of the Draft RMP/EIS is accurate. The total amount of land the Natives have selected is the combination of land that is Dual-selected and Native-selected (44,000 + 2,100,000 = 2,144,000 acres total). The same is true for land selected by the State. Map 18 of the Draft RMP/EIS only shows land status for those lands currently open to

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	only 44,000? Also, Map 18 appears to support the notion of a lesser area of dual-selected lands.	mineral entry. Much of the dual-selected land is closed to mineral entry by a d(1) withdrawal and is therefore displayed as light pink.
0355-42	Alternative C is not acceptable. The restrictions included in Alternative C are not needed to manage the area. There are a multitude of regulations already in place that can assure that resource damage does not occur and closures and restrictions are not needed, no matter which alternative or mix of alternatives is selected and becomes the final plan.	NEPA requires an analysis of a wide range of alternatives in order to compare environmental consequences. Alternative C considers management actions that would implement strong area-wide protections. The Draft RMP/EIS analyzes the effects of implementing such an alternative on all resources, including the mineral industry (see pp. 519, 520).
0386-7	The boats is another thing. Up along the Gulkana River, we talked about the drinking water and the fisheries, the spawning areas. I don't know if it's really truly addressed but I hear locally that there's too many boats, too many motors, too much oil coming down on that river there. And there needs to be some type of, you know, limited restrictions on those areas there.	Concurrent to the development of the RMP, the River Management Plan for the Gulkana is being revised. Explanation of proposals under that revision (which will be consistent with decisions made in the RMP) are presented on page 56 of the Draft RMP/EIS.
0390-2	And also regarding the Pipeline Corridor, when they had that agreement there, we weren't -- this village here wasn't notified on the agreement between Alyeska and AHTNA for the Pipeline Corridor, and if we were notified we would have been there at that meeting, but we -- it wasn't so.	The agreement referred to was between Alyeska and Ahtna and is not affected by this planning document.
EDUCATION		
0010-2	AHTNA Incorporated has close to two million acres, I think it's 1.7 something million acres of land scattered throughout the Basin along the highway and so it is a great concern and when you're considering recreational uses and so forth, make sure that people the public knows that there are cabins out in the distant lands and so forth, that they observe the no trespassing rule.	BLM is committed to educating 17(b) easement users that they are using a limited right-of-access along a specific route when crossing Native corporation owned lands BLM will work with the land owner, state and other Federal agencies and the public regarding the rights reserved by the federal government and the fact that easements users are crossing privately owned lands to reach public lands.

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0020-30	We need some education. I've testified many times before, not only with elders to know the regulations, but people have to be aware that this private lands they're destroying.	Comment is referring to 17(b) easements. The Draft RMP/EIS identifies education/interpretation as one of the discretionary actions it would take on 17(b) easements, based on priorities listed on page 34.
0044-19	Educational signs with consequences for violators should explain the irresponsibility of using wildlife for target practice. [sic] (I speak specifically of the Parka Squirrel)	Thanks for the suggestion. Specifics for education/interpretation signage will be considered in implementation-level planning. Also see response to comment 0333-2.
0060-3	[T]here's a need to set a precedent … in terms of off-highway vehicle use. [T]here's a need to place a strong emphasis on education while that's still a possibility rather than trying to manage after the fact.	On page 32 of the Draft RMP/EIS, a goal for Travel Management is: "Manage trails with an emphasis on education where appropriate." Alternatives C and D under Travel Management focus on a ramped up education effort with regards to OHV use, especially on State-selected lands. The plan acknowledges the importance of education.
0333-2	[A]ll management of these lands should include education, not just regulations. People need to know their actions effect everything and everyone. They need to know that driving ATV' into salmon streams is harmful, that riding snowmachines too close to caribou in winter is wrong, that wetlands provide important habitat to birds and animals.	Education is an important component of BLM's proposed management described in Chapter 2 of the Draft RMP/EIS. See page 33 (Implementation-level planning), Recreation table on page 66 (Education and interpretation), and page 75 (Cultural Resources, 1st bullet statement).
MANAGEMENT OF SELECTED LANDS		
0020-16	You have a custodial management duty on Native [selected] lands until they are conveyed. Custodial means, not ignoring the damage being done. Inaction is creating damage on our lands that we're waiting conveyance, we can't speed up this conveyance process so Native lands that are waiting conveyance need to be protected, not just managed, or "managed", they're not being managed, but they're not being protected. So somewhere in your policy you need to write that these are private lands, irregardless of their conveyance status.	The Draft RMP/EIS clearly states that Native lands are private lands. However, Native or dual-selected lands are not private lands but are public until such time that conveyance takes place. The Draft RMP/EIS, particularly in Travel management, emphasizes the need to work with Ahtna Inc. or village corporations in trail management. See pp. 40 and 47 under "Chistochina-Cantwell Area". This travel management area is considered under both alternatives C and D. In addition, BLM is committed to working with Ahtna, Inc. on management of 17(b) easements. See responses under the Access category.
0020-24	Interim management. You emphasize education but you will not issue citations, well,	BLM, Glennallen Field Office, does issue citations for a variety of natural resources related violations (eight were issued in fiscal year 2004). However, we are limited in the

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	how are you going to enforce this if you're not going to issue citations? Native lands need to be protected. Our allotments, we have people crossing our Native allotments here and nobody's stopping it and Troopers won't respond, we need your help, that's your job, your duty to protect those Native allotments.	enforcement we can conduct on 17(b) easements. See response to comment 0379-3 under the Access category.
0060-5	There are several arguments that support BLM taking a proactive approach in management despite future land transfers, each of which is worth a brief discussion below. First, the depth and scope of the planning process thus far overwhelmingly demonstrates BLM's commitment. Second, the precedents set by BLM will have impacts long after land exchanges occur. And finally, there are no guarantees that ownership will be transferred on the predicted schedule, given that this has rarely been the case in the past. … While state, Native, and federal management imperatives differ, precedents are nonetheless extremely powerful across land ownership categories. This is particularly true in the case of disallowing uses that have formerly been popular in a given area. If, for example, off-road use becomes common in an area while that area is open to such use, subsequent closure becomes politically, socially, and logistically challenging. If, on the other hand, an area has previously been closed to a particular use, users may become habituated to a different area. Because of this tendency, it is much easier for new land managers to follow the precedents set by previous land managers than to create new ones. In particular, it is sometimes almost impossible for new land managers to create regulations that are substantially stricter than the old ones from an environmental perspective. Thus, it behooves	Thank you for the comment. Your line of reasoning was a driving force in BLM's recognition that this current planning effort needed to be completed, even with an accelerated conveyance process in place.

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	BLM to set precedents with this in mind. Land transfers have been delayed before, and they may be delayed again. Use patterns, development patterns, human populations, and technology are all changing, and much can happen in a few short years. Even if some of the lands in question remain under BLM control for only four or five more years, the management practices during that time period will have important impacts. If they remain in BLM control far longer, the effects will multiply. Short duration of tenure does not preclude the best possible management decisions. Thus, NAEC [Northern Alaska Environmental Center] urges BLM to show the most responsible, complete, and forward-looking stewardship possible throughout the planning area. In most cases, Alternative C, the conservation alternative, meets this level of stewardship; thus NAEC endorses it as the preferred alternative.	
0173-12	It is totally inappropriate to include State and Native selected lands in any designation of an ACEC. These selected lands will in all likelihood become State or Native lands in the future. Therefore, no restrictions should be imposed on these lands that could complicate transfer or management of the lands.	There are no ACEC designations proposed on selected lands in Alternatives A, B, and D (BLM's preferred alternative). Also see response 0173-33.
0173-33	It is inappropriate to include State and Native lands in the defined alternatives. These selected lands will in all likelihood become State or native lands in the future. Therefore, no restrictions should be imposed on these lands.	We disagree. None of the proposals considered under alternatives C or D would create encumbrances on State or Native selections. BLM's current and proposed management of selected lands is completely consistent with ANILCA, section 906(k). ANILCA and ANCSA task BLM with interim management of these lands so we would be remiss in not considering them.
0312-89	The BLM should proactively manage all lands it administers, regardless of status, until conveyed. Management of selected lands should err toward conservative 'stewardship'	BLM's proposals for management of selected lands within the Draft RMP/EIS are consistent with ANILCA 906(k) and were developed in coordination with the State and with Native and village corporations. BLM is committed to the management of these lands until they are conveyed or relinquished.

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	obligations. This will ensure that the lands remain in high quality, minimally disturbed resource condition when, and if, State and Native-selected land conveyance occurs. By preserving lands it administers today, the agency is preserving lands it may retain after conveyances are settled. We support cooperative agreements between the BLM and Tribal Governments within the planning area regarding the management of Native Selected lands.	
0312-90	All proposed SRMAs, RNAs, and ACECs should include selected lands within their boundaries. This will prevent management and enforcement problems when, and if, land ownership changes in the planning area.	Selected lands are included in designations under Alternative C.
0329-52	The East Alaska BLM lands that are state and native selected are likely to be among those that are left over when over-selections have been dealt with. While lots of this land will lapse into private ownership, lots of it will not. Please manage all this land as if you were managing it forever.	Please see response to comment 0312-89.
0329-120	It is interesting that "Realistically, if exploration showed true potential for development, these lands would likely be conveyed to the Native corporations or the State." (p.521) Given this, what impact would the action alternatives have on conveyance? Areas opened to exploration would become more likely to be conveyed.	No actions proposed within this plan will have an affect on the conveyance process, see page 13 of the Draft RMP/EIS, "Issues beyond the scope of the plan".
0331-3	The proposed methods of interim management (before lands are either conveyed or become unencumbered BLM lands) are seriously flawed. BLM should be a good steward of selected lands, so that resource values are protected for whatever entity ultimately controls them. Instead, by following the state's weak management guidelines, BLM proposes, under	The intent of the preferred alternative (D) is to limit OHV users to existing or designated trails. However, in order to designate trails in any given area and enforce no OHV travel off of designated trails, the following must occur: a) complete inventory of all existing trails in the area; b) determination of which trails are necessary based on public input, providing for subsistence, recreation, resource development, etc; c) publishing the designated trails in the Federal Register; and d) enforcement. BLM recognizes that it is not ready for that level of detail in this RMP decision. Therefore, it must set the stage in this RMP and prioritize areas for implementation-level planning. Logically, the first

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	alternative D, to allow degradation of lands and resources during the interim. The same problem would occur with regard to "existing trails" on selected lands in Alternative C.	priority is for areas that we know we will manage long-term. In the meantime, BLM will increase it's OHV management on other lands (such as State-selected lands) through education and enforcement.

E. Index of Comment Letter Numbers

Below is a list of names of those who commented on the Draft East Alaska RMP/EIS and their assigned comment letter number. Also shown are the page numbers where responses to their specific comments can be found. If, through the content analysis process, it was found that a letter was a variation of a form letter rather than unique comment, the comment number of the form letter will be referenced and responses to all comments can be found by looking under that form letter number. Organizations and government entities are listed by the organization or the government agency rather than by the signature to the submission. An index organized by comment letter number rather than alphabetically by last name follows as well.

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Cranston, Edwin	0109	*see comment letter # 0084*
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