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## APPENDIX J: RESPONSE TO COMMENTS

### A. Introduction

On May 5, 2006, a notice was published in the Federal Register announcing the availability of the Kobuk-Seward Peninsula Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) (Federal Register 2006a). 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 twelve public meetings and subsistence hearings to gather testimony on the Draft RMP/EIS and to answer questions. The comment period was later extended until September 15, 2006 resulting in a 132-day comment period. For a more complete description of the public involvement efforts see Chapter V.

Approximately 4,000 comments received on the Draft RMP/EIS during the public comment period. Of these total comments, approximately 3,830 were submitted as two 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 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 2005o: 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 in Section D.

Once identified, each substantive comment was entered into a database to allow sorting based on topic. Comments are listed by general topic: Resources, Resource Uses, Special Designations, Social and Economic, and Process and General. They are further broken down into subcategories under these general categories as shown in Table 1. These general topics follow the same outline as the Draft RMP/EIS, with additional categories for comments on the RMP/EIS process and general comments not falling under a particular category. These substantive comments and the responses to them comprise the bulk of this appendix. Comments are included 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. Examples of non-substantive comments not further addressed include:

"No hunting or killing of wolves, bears or any other species should be allowed."

"I support Alternative C."

"We do not support designation of any further areas as Wild or Scenic rivers."

"I strongly oppose drilling, mining, and any other type of exploration in the NANA region."

"Alternative D (the BLM's preferred alternative) shows me that the BLM cares much more for maintaining the corporate timber industry wealth, than it does the Western Arctic Caribou Herd."

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

## C. Summary of Comments by Topic

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

**Table J-1. Summary of Substantive Comments Received by Category**

Subject or Resource	Number of Substantive Comments	Percent of Substantive Comments	
<b>Resources</b>			
Soil, water, and air quality	4	0.6	1.7
Vegetation	7	1.1	
Fisheries	17	2.7	17.5
Caribou	58	9.2	
Other Wildlife	35	5.5	
Fire Management	3	0.5	1.9
Cultural Resources	3	0.5	
Visual Resource Management	1	0.2	
Wilderness	5	0.8	
<b>Resource Uses</b>			
Forestry	2	0.3	1.4
Livestock Grazing	7	1.1	
Leasable Minerals	28	4.4	10.3
Locatable and Salable Minerals	23	3.6	
General Minerals	14	2.2	
Recreation - Squirrel River	45	7.1	15.7
Recreation - Kigluaik Mountain	6	1.0	
General Recreation	37	5.9	
Travel Management	11	1.8	
Renewable Energy	4	0.6	6.5
Lands	27	4.3	
ANCSA (d)(1) withdrawals	10	1.6	
<b>Special Designations</b>			
ACEC/RNA	46	7.3	12.5
General Special Designations	4	0.6	
Wild and Scenic Rivers	29	4.6	
<b>Social and Economic</b>			
Social and Economic	11	1.8	9.7
Hazardous Materials	6	1.0	
Environmental Justice	1	0.2	
Subsistence	43	6.8	
<b>Process and General</b>			
Process	13	2.1	9.2
Public Outreach	23	3.6	
NEPA Adequacy	22	3.3	
General	25	4.1	13.5
Maps	6	1.0	
Climate change	21	3.3	
ROPs and Stips	20	3.2	
Editorial Changes	13	2.1	
<b>TOTAL</b>	<b>630</b>	<b>100</b>	

## **1. Resources**

### **a) Soil, Water, and Air**

The comments on soil, water and air resources focused on adding some additional discussion and information to the EIS on permafrost, groundwater, and climate. Two additional comments referred to compliance with the Clean Water Act and the potential for impacts to the Pilgrim–Kuzitrin–Kougarak river system from mining activities on BLM land.

### **b) Vegetation**

The seven substantive comments on vegetation covered a variety of topics, including comments pertaining to monitoring vegetation in caribou habitat and obtaining more data on vegetation communities in the planning area. One comment emphasized protection of wetlands. The most common theme was the importance of lichen-rich plant communities for caribou and the need for BLM to recognize the worth of these habitats and manage them appropriately.

### **c) Fish and Wildlife**

About 17% of the comments focused on fish and wildlife. More than half of these comments were about caribou. In general, wildlife comments were supportive of adopting Alternative C as the preferred alternative. There was strong support for closing caribou habitats to mineral entry and/or providing additional protective measures to wildlife habitats, particularly for caribou and moose. One comment recommended opening areas to mineral entry and noted that the EIS over emphasizes impacts to wildlife from mining. Other comments stated that the EIS did not sufficiently analyze impacts to wildlife from mining.

Comments were supportive of BLM working with the Alaska Department of Fish and Game (ADF&G), noting that BLM should manage habitat to support population management objectives developed by ADF&G and assist in population monitoring and inventory. One person recommended that RMP consider introduction of Dall sheep and marmot in the Kigluaik and Bendeleben Mountains. Many comments also recommended that BLM continue to consult and coordinate with the Western Arctic Caribou Working Group.

Comments on caribou focused on protection of habitats important to the Western Arctic Caribou Herd. Most of the comments were supportive of additional protection of caribou habitats by the use of measures such as closure to mineral entry, development of required operating procedures (ROPs) and stipulations, designation of ACECs, no surface occupancy areas, designation of right-of-way avoidance or exclusion areas, and fire management to protect lichen habitats. Many comments expressed concern about protection of caribou migration routes and the avoidance of disruptive activities, such as an excessive number of hunters, in these areas during migration.

Many comments noted that moose populations on the Seward Peninsula are currently very low and riparian habitat should be protected to assist in recovery or maintenance of moose populations. Several noted that a 300-foot setback is not sufficient to protect riparian habitat on the Seward Peninsula.

Fisheries comments included concern about protecting the Kigluaik Arctic char, impacts of mining on fish, and the 300-foot setbacks proposed on many rivers. Comments were supportive of setbacks and closures of important fish habitat to mineral entry. Although some noted that a 300-foot setback was not adequate to protect fish and riparian habitat.

#### **d) Special Status Species**

Comments on special status animals focused on spectacled and Steller's eiders, Kittlitz's murrelet, polar bear, and walrus. Most of the comments regarding eiders had to do with complying with the Endangered Species Act or the need for further analysis of these species in the EIS. Comments on the murrelet noted the need to take the necessary management action to prevent future federal listing of the species. Comments on polar bear and walrus were in regard to compliance with the Marine Mammal Protection Act and the possible need for additional information and analysis in the EIS.

#### **e) Fire Management and Ecology**

One of the comments was editorial. The other two concerned managing fire to protect lichen rich habitats for caribou.

#### **f) Cultural and Paleontological Resources**

Only three substantive comments were received on cultural resources. There were no comments on Paleontological resources. These comments concerned: avoiding and mitigating impacts to cultural resources, the potential impacts from activity on BLM land to adjacent cemetery and historic sites, and BLM's responsibility to consult with Tribes under Executive Order 13175.

#### **g) Visual Resource Management (VRM)**

BLM received only one substantive comment on VRM. The comment stated that a VRM class II designation would hinder or possibly preclude the development of mineral resources in these areas and encouraged BLM to remove all VRM class I and II areas from the RMP/EIS.

#### **h) Wilderness**

Five substantive comments on wilderness were received, all questioning the lack of wilderness inventory and consideration in the Draft RMP/EIS. One also questioned the legality of the Secretary's directive regarding wilderness inventory and consideration in land use planning in Alaska.

## **2. Resource Uses**

### **a) Forest Products**

The two substantive comments were received on forest products. One opposed any commercial logging in the planning area. The second provided additional data on the presence of spruce bark beetle killed trees.

### **b) Livestock Grazing**

BLM received seven substantive comments on livestock grazing. Two comments recommended that BLM continue its current management for reindeer grazing operations. The same organization was opposed to closing any areas to reindeer grazing. Three comments supported a program of limited reindeer grazing, the closure of two allotments to grazing, and the reduction of conflicts between reindeer grazing and caribou management. One comment noted that the impacts of grazing from reindeer are miniscule compared to the impacts from tens of thousands of caribou and that concern about overgrazing should be from caribou, not reindeer.

### **c) Minerals**

About 10% of the substantive comments received concerned minerals management. These were broken down among locatable minerals, leasable minerals, mineral materials, and general mineral related comments. Forty-three percent of these comments were editorial or recommended additional information or clarification in the EIS. Several of the comments referred to the assumptions for analysis and reasonably foreseeable future actions. Three comments questioned BLM's characterization of the presence and availability of minerals in the planning area. Another questioned the price per barrel used to predict oil development under the cumulative impact analysis.

One comment encouraged BLM to continue its efforts to conduct modern geophysical, geochemical and water surveys along with geologic mapping, and mineral and energy resource studies. Another recommended that BLM not allow mineral material sales in riverbeds. Two comments recommended development of additional ROPs for restoration and more oil and gas leasing stipulations.

Another major subject of mineral comments was general concern about impacts to the environment from mining. These included concern about impacts from oil spills, construction of new roads, impacts on caribou, restoration requirements, and clean up of past mining activity. The bulk of the remaining comments focused on either closing or opening BLM areas to mineral entry and either lifting or maintaining the ANCSA (d)(1) withdrawals. The majority of these comments favored closing BLM-managed land to mineral entry. However, a few supported lifting of the withdrawals.



## **d) Recreation Management and Travel Management**

Approximately 16% of the total substantive comments received concerned recreation and travel management, including management of off-highway vehicles (OHV). Forty-seven percent of these pertained to the Squirrel River and six percent specifically addressed the Kigluaik Mountains. Thirty-four percent of the recreation/travel management comments were about general recreation issues or were not area specific. Twelve percent of the comments were about travel management, most of these addressed OHVs. These comments are broken down by the following subcategories: Squirrel River, Kigluaik Mountains, General Recreation, and Travel Management/OHV.

### **Squirrel River**

Approximately 7% of the total comments pertained to the Squirrel River. Comments on the Squirrel River focused primarily on management of recreational use in the area, particularly hunting related recreation, impacts on caribou migration, and regulation of OHVs. Several comments supported identifying the Squirrel River as a special recreation management area (SRMA) and developing a Recreation Area Management Plan (RAMP). One comment opposed designating the area as an SRMA. At least three stated that the proposed time-frame for developing the RAMP was too long. Several recommended extensive coordination with the State and local government agencies, other federal agencies, advisory boards, etc. during development of a RAMP. Eight comments noted that interim management measures to be implemented during development of the RAMP were not sufficient. Three comments recommended expanding the size of the Squirrel River special recreation management area. Fourteen comments supported putting limits on recreational use in the Squirrel River. Some focused only on commercial users while others recommended limitations on the total number of visitors. A few recommended that only the number of non-local people be limited. One noted the potential for increased recreational use and conflict in the upper Kobuk River area if restrictions are implemented in the Squirrel River. Seven comments focused on the impact of recreational use on caribou migration. Four comments recommended some limitations on OHV use in this area, particularly during the snow-free season. The need for additional law enforcement and safety issues were cited by several. One comment recommended closing the area to mining. Another cited the need to address access for mining in the RAMP.

### **Kigluaik Mountains**

Several comments (one percent of the total) were supportive of managing the Kigluaik Mountains for recreational use or as a special recreation management area (SRMA), and one comment recommended designation as an Area of Critical Environmental Concern. Another comment noted that the Draft RMP/EIS failed to provide sufficient rationale to warrant designation as either a Research Natural Area or as a SRMA, particularly in light of the mineral values found in the area. Four comments recommended limiting OHV use, particularly by four wheelers during the summer. Two felt that classifying the Kigluaik Mountains as a semi-primitive motorized area was not appropriate for the area. Another comment recommended implementation of a monitoring and permitting system for helicopter and fixed-wing tourism in the area. Three comments opposed any development in the area.

## **General Recreation**

General comments on recreation were similar to those on the Squirrel River. Sixteen comments related to better managing recreational use in the Extensive Recreation Management Area. Comments included recommendations to put some sort of limitations on the level of commercial recreational use (12), avoiding putting limitations on subsistence users (two), giving the Field Manager the authority to deny special recreation use permits that would negatively affect wildlife or subsistence (two), and putting limits on the number of allowable visitor use days (one). One comment opposed putting any limits on the individual recreational user and stressed that BLM consider other management options besides limiting use. Two noted the need for additional law enforcement. One comment opposed designation of an Extensive Recreation Management Area. Another recommended several additional special recreation management areas. Two comments related to recreational cabins: BLM should make it easier to get authorization for recreational cabins; BLM should not allow recreational cabins. Other concerns included potential impacts of recreation on caribou migration, improved coordination with other agencies and advisory committees, clarification of the impact analysis in the EIS, and the potential for guided fishing to conflict with subsistence in the future.

## **Travel Management (Off-Highway Vehicles)**

Five comments (2% of the total) supported some type of limitation on OHV use in the planning area, especially during the snow-free months. Two specifically recommended limitations on the use of ARGOs or other vehicles with more than four wheels and one recommended limiting the number of bush planes. Two comments mentioned impacts from OHVs and the need to address these impacts in the EIS. Three comments were editorial or requested clarification. Two comments recommended revision or improvement of the analysis of impacts from OHV.

## **e) Renewable Energy**

BLM received four substantive comments on renewable energy. One of the comments voiced in a form letter with 317 signatures recommended reducing dependence on finite sources of energy like coal, gas and oil, and moving toward a cleaner, renewable energy sources. Another noted that we should reduce the need for gas and oil through conservation efforts, rather than drilling for more. Two comments noted that the Draft RMP/EIS did not provide an adequate discussion of the potential for renewable energy within the planning area, including the possibility of wind turbines.

## **f) Lands and Realty Actions**

BLM received thirty-seven substantive comments related to lands and realty covering a wide variety of topics. In table M-1, these are broken down between Lands and ANCSA withdrawals. In the following discussion, they are consolidated into the following broad topics: rights-of-way/transportation corridors/easements, Land Disposal and Acquisition, and ANCSA withdrawals.

## **Rights-of-way, Transportation Corridors, and Easements**

Two comments recommended establishment of right-of-way (ROW) avoidance or exclusion areas to protect caribou. Others concerned potential impacts to caribou migration from linear ROW such as roads. Two recommended that the RMP provide broad latitude for approval of ROW and transportation routes to facilitate future development opportunities. One comment recommended additional consideration of transportation corridors. Four comments addressed 17(b) easements. One was editorial, two made recommendations on how easements should be managed and the last one was in opposition to any additional easements.

## **Land Disposal and Acquisition**

Several comments opposed making any BLM lands available for sale. One comment opposed acquisition of any land in the planning area. Two comments concerned trapping cabins. One recommended allowing trapping cabins in special management areas or administratively designated areas. Another requested that BLM modify discussions and decisions relative to trapping cabins to be more consistent with the State. Two comments recommended proactive management of State- and Native-selected lands in the RMP/EIS. One comment noted that management decisions for the Nulato Hills should be consistent with those in the Central Yukon RMP. Several comments referred to ongoing activities outside the planning process. Such as Native Allotments (two), conveyance of land to the State and Native Corporations (one), and RS 2477 rights-of-ways (one).

## **ANCSA (d)(1) withdrawals**

Ten comments were related to ANCSA (d)(1) withdrawals. Three recommend keeping the withdrawals in place, while three others recommended lifting all the withdrawals. One additional comment noted that BLM should not continue with the proposal to lift all the withdrawals without replacing them with adequate protections and accounting for the effects on subsistence. Two comments concerned BLM's ability to handle the additional workload that would accompany such a change in mineral management policy. One comment requested that the Final RMP/EIS include an explanation of the steps required to lift the withdrawals.

## **3. Special Designations**

About 13% of the comments regarded special designations. Of these, fifty-eight percent related to Areas of Critical Environmental Concern (ACEC) and thirty-six percent to wild and scenic rivers. Comments pertaining to the Mount Osborn Research Natural Area are included under ACECs. The remaining five percent were general comments. This section is further broken down to ACECs, General Special Designations, and Wild and Scenic Rivers.

### **a) Areas of Critical Environmental Concern (ACEC)**

Comments on ACECs were included a wide variety of topics and varied from general recommendations to specific management proposals. One comment was generally in opposition to ACEC designations proposed under Alternative C while others supported these ACECs. Several comments noted that proposed management restrictions in ACECs under the Preferred Alternative are not sufficient to protect the relevant and important values

of the areas. One comment noted that selected lands should be included within ACEC boundaries.

BLM received three comments nominating additional areas as ACECs. These included: seashore sites near Unalakleet, Koyuk, Teller, and Kivalina; the Bendeleben and Darby Mountains; the American and Agiapuk rivers; and the caribou migration corridor near Selawik.

Sixteen comments were specific to the Nulato Hills. Four comments supported designation of this area as an ACEC and five comments recommended that the area be closed to various forms of mineral entry and leasing. Management related comments included development of a fire management plan to protect lichen for caribou, development of an ACEC management plan soon after approval of the Final RMP, that BLM manage the area consistent with the adjacent Central Yukon Planning Area, and that management measures from Alternative C apply to the Preferred Alternative. Two comments noted that the Preferred Alternative does not provide meaningful protection in this ACEC.

BLM received numerous comments on the Western Arctic Caribou Calving and Insect Relief ACEC. Three comments specifically supported designation as an ACEC and six comments recommended that BLM close the area to various forms of mineral entry and leasing. Two comments noted that the Preferred Alternative does not provide meaningful protection in this ACEC.

Specific comments on the Ungalik, Shaktoolik, and Inglutalik ACECs included three comments on each recommending closure of these areas to various forms of mineral entry and leasing. One additional comment on the Ungalik noted that the Final EIS should include more analysis of potential impact from mining on state managed land – such as below ordinary mean high water.

Several comments supported including McCarthy's Marsh (six), the Upper Kuzitrin Rivers (five), and the Kigluaik Mountains (three) as ACECs in the Preferred Alternative. One comment noted that McCarthy's Marsh should be a right-of-way avoidance area while another noted that a semi-primitive motorized designation was not appropriate in the Kigluaik Mountains.

One comment supported designation of Mount Osborn as a Research Natural Area (RNA). Another recommended that the boundary be expanded to include adjacent selected land. One comment recommended closure of this area to mineral entry. The State noted that many lands near Mount Osborn are high priority state selections. They expressed concern that RNA designation may impede access to and development of resources on both federal and state-owned land, and may preclude the State's use of management tools for fish and wildlife such as weirs or radio towers. Given that much of the land in this area is selected one comment recommended that final management decisions apply upon completion of the Final RMP, rather than implementing interim management decisions.

## **b) General Comments on Special Designations**

The general comments included a recommendation for some type of protective designation of the Koyuk River, Inglutalik River, and Ungalik River. Two comments pertained to management of lands adjacent to specially designated areas after land conveyances are

completed, including the recommendation to incorporate adjacent lands remaining in BLM ownership into the specially designated areas. Another comment expressed opposition to any new special designations. The State expressed concern regarding justification and availability for access corridors and mineral development on administratively designated lands.

### **c) Wild and Scenic Rivers**

Many of the comments voiced support for identification of one or more rivers as suitable for designation as wild or scenic. A few comments supported all eleven rivers recommended as suitable under Alternative C of the Draft RMP. Others specifically mentioned one or more rivers to be considered suitable. These included the Agiapuk River (four comments), the Kivalina River (one), the Ungalik (two), Fish River (three), Ipewik River (one) and the Kukpik River (one). Four comments suggested BLM revisit the Preferred Alternative and include one or more rivers as suitable under that alternative. One of these comments was from a form letter with approximately 3,500 signatures. Two comments opposed suitability determinations on any rivers.

Several comments referred to outstandingly remarkable values (ORV) of the rivers. One comment noted that BLM should continue to manage the Squirrel River to preserve its ORVs even though BLM has already made a non-suitable determination and submitted it to Congress. Four comments note that more information needs to be included in the Proposed RMP/Final EIS, describing the ORV of each river and to how these values will be protected. One comment recommended a watershed based management approach for rivers. Several additional comments were editorial. The State recommended that language in Alternative C prohibiting dams be clarified as only applicable to BLM-managed land.

## **4. Social and Economic**

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

### **a) Social and Economic**

Eleven substantive comments were received on this topic. One comment related to the economic benefit of the reindeer industry. Another highlighted the social problem in the Squirrel River due to overcrowding and the need for BLM to address this issue. Several comment questioned the economic benefit of resource development to the planning area residents. Concerns included lack of good jobs for locals, lack of involvement of local communities in development of resources, and the short-term benefit of development versus long-term impacts to the environment. Other comments noted the need to promote resource development in order to provide economic opportunities and jobs. A couple of comments questioned economic data and analysis of effects.

### **b) Hazardous Materials**

One percent (six comments) pertained to hazardous materials. One concerned the health effects of prescribed burning. Several recommended clarification of text, tables and maps

regarding the number of sites, the type of contamination at each site, and which are administered by BLM. One questioned the relationship of hazardous material sites with abandoned mine lands and noted that the list of potential effects was overstated relative to the size of the problem.

### **c) Environmental Justice**

The single comment on environmental justice noted that BLM did not adequately evaluate the possible effects of non-local hunters on local communities as part of its mandate to consider environmental justice.

### **d) Subsistence**

Forty-three comments or almost seven percent of the total pertained to subsistence. In addition, many comments under the Fish and Wildlife, and Recreation categories also related to subsistence. The subsistence comments generally expressed concern that BLM continue to provide access for subsistence, eliminate, reduce or mitigate impacts on subsistence users, and place emphasis on management of fish and wildlife for subsistence purposes. Many of these comments mentioned impacts to subsistence from BLM approved activities such as mineral development and recreation. Several recommended that such use or development not be allowed. Several comments also referred to the Section 810 analysis on the Draft RMP/EIS and BLM's compliance with Section 810 of ANILCA.

Many comments noted that subsistence should be a priority in the RMP. One person noted that many Native corporations have developed land use policies for protection of the land for subsistence purposes and when lands were selected by ANCSA corporations subsistence uses were of primary concern. BLM should develop a policy to protect subsistence uses on selected land even though ownership may revert to BLM. A few recommended specific management options in the RMP such as allowing for personal use firewood and house log harvest.

Numerous comments were gathered through spoken and written 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 subsistence in the daily lives of those living in the region. Excerpts representative of these testimonies are included below.

- “I am worried about my grandchildren. You know what [are] they gonna eat? ...they can't even go college, no money to go college so there's only two or three that graduate from college. I am proud of them but I am real concerned about subsistence. It's our way of life”.
- “I've got a concern saying about the Squirrel River. The Squirrel River area has been used by the Natives ever since I was old enough to remember. That's quite awhile, long, long time ago. I remember the people from here that passed by Kiana and used that area up there...”
- “Hunting and fishing and gathering is our livelihood. And I was born and raised here. I am 67 years old. I hunted Squirrel River area ever since I was old enough to hunt and my Native Mother and her family did that before me. So I consider the Squirrel River our backyard. Our main hunting ground. And these issues are very important to

us. Although we have a different lifestyle now days, we still use our subsistence way of living, our way of hunting.”

- “The caribou, seals, fish, whales, ducks, walrus, geese, and berries are the most important things in this area to our family and those who live here. Our lives evolved around their migration habits. We depend on this food to exist here. When one family has an abundance of harvested meat, we share it with our relatives in another local community who have not been so blessed. ...It is our way of living...”
- “The lands are very important to my family and I. Even though both of us in the household work, we still depend on our caribou, wildlife. I can’t afford \$20 for the pork chops, \$10 for the chicken (the cheapest kind), \$7 for a pack of bacon/sausage, then to include the necessities like fuel oil, propane, electric, water, and phone.”
- “BLM should be looking at what’s best for the rural residents and their lifestyle, which they depend on thru [through] subsistence on the lands managed by BLM.”
- “I do rely on the Western Arctic Caribou herd for my subsistence needs to help me and others get by in the winter months and also subsistence fishing and waterfowl hunting. These are important to me and my family.”
- “Caribou is very important to us. We always have it fry, boil, stew meat, or dry meat. It keep[s] us [in] good health and warm, and not “hungry” right away.”
- “Sometimes we don’t have planes for days and the store runs out of hamburger, milk and meats, the people look in the freezer and find delicious caribou and enjoy a stew or steak, with or without planes. The land is a life and death issue for all the people in Alaska.”

## 5. RMP/EIS Process and General

Approximately 9% of the total comments are on process. This category is further broken down into: Process, Public Outreach, and NEPA Adequacy.

### a) Process

#### General Process

These thirteen comments covered a wide variety of topics. Several comments related to BLM’s obligation to consult with the Fish and Wildlife Service under Section 7 of the Endangered Species Act. Another related to consultation with Native corporations on cemetery historic sites that might be affected by actions in the RMP. One requested that BLM follow the same process used in the East Alaska RMP/EIS to describe and highlight changes from the Draft RMP to the final RMP. There were also comments about how the plan would be implemented and the development of activity level plans.

#### Public Outreach

Twenty-three substantive comments were received on this topic. Several comments concerned public notification, opportunity for public comment and/or requested an extension of the comment period. Six comments concerned Tribal or government-to-government consultation. Many of these pertained to a perceived lack of consultation or deficient consultation. Three comments noted the need to improve BLM’s public outreach efforts or questioned how BLM would keep the public informed. Three comments referred to the ANILCA Section 810 process: that hearings were held too early in the comment period; that BLM should develop a revised Draft RMP/EIS and revised Section 810 Analysis; and that Section 810 requires BLM to solicit comments from the Federal Regional Advisory Councils

(RAC). A couple comments related to the exception, modification, and waiver process for ROPs and stipulations: one recommending that a public process be conducted if industry asks BLM for an exception, waiver or modification to the ROPs and oil and gas leasing stipulations: others requesting that BLM consult with the Western Arctic Caribou Herd Working Group if exceptions, waivers, modifications, or proposed development are likely to affect caribou habitat. One comment concerned cooperating agency involvement in the Draft RMP/EIS.

### **NEPA Adequacy**

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

## **b) General**

Approximately 13% of the total comments fall under general. The General category is further broken down into: General, Maps, Climate Change, ROPs and Stipulations, and Editorial.

### **General Comments**

This topic encompasses many comments that did not fit under other categories, ranging from rewording or reorganizing the document for clarification to general concerns about potential impacts to Alaska's wildlife, vegetation, and scenic values. Some people were concerned about impacts to the land from recreation and development while others feared increased or unnecessary regulation. Some comments noted inconsistencies in the document. Others requested the inclusion of additional information. Many of the comments were generally supportive of subsistence and protection of resource values.

### **Maps**

Six comments were on maps. About half of these involved improving the maps by displaying the geographic locations of features mentioned in the text on a map, labeling features on the maps, adding additional data to the legend, or correcting errors. Two comments recommended the addition of new maps, including a map showing caribou migration corridors and a series of maps depicting the relationship of the special management areas and pertinent restrictions by alternative.



**Climate Change**

Twenty-one comments pertained to global climate change. More than half of these comments felt that the Draft RMP/EIS fails to adequately consider the effects of climate change, either in general or on specific resources such as caribou, spruce woodlands, and soil. People felt that the plan must be flexible to allow management to quickly adapt in respond to impacts from climate change. Several comments generally note that BLM needs to take climate change seriously and/or do something about it. One comment noted that the final RMP/EIS should consider how the proposed actions, alternatives, goals and objectives may contribute to and/or reduce impacts to climate change. Another comment noted that the Final RMP/EIS should consider international circumpolar marine transportation routes as a reasonably foreseeable future activity and evaluate the potential cumulative effects associated with such a scenario.

**Required Operating Procedures (ROP) and Stipulations**

Twenty substantive comments related to this topic. Several recommended changes to specific ROPs and stipulations, or encouraged the development of strong ROPs to protect caribou and moose habitat, riparian habitat, and fisheries. Some recommended application of area specific stipulations to protect important caribou habitat. Two comments noted need for additional ROPs were to address requirements for the abandonment, removal, and reclamation of mineral exploration and development sites after operations have ceased. Two comments requested that BLM monitor the effectiveness and compliance with ROPs and stipulations. Two noted that BLM should not allow exceptions, modifications, and waivers of the ROPs and stipulations. The State recommended that BLM develop ROPs to protect riparian and fisheries habitat rather than considering mineral withdrawals.

**Editorial**

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

**D. Response to Individual Comments**

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

# TABLE J-2. RESPONSE TO COMMENTS

## 1. RESOURCES

Letter # - Comment #	Comment	Response
<b>SOIL, WATER AND AIR</b>		
24-2	<p>The Pilgrim–Kuzitrin–Kougarok river systems is currently a rather healthy system and if as I understand correctly some of the areas under Alternative B which would open up [to mineral entry] south of the Bering Land Bridge preserve could affect those water quality resources. There has not been to this current time, any rapidly or severely invasive mineral uses. There is a hard rock mine proposal [Rock Creek]. This area [southern Seward Peninsula] has not seen a mine of that caliber before and there is the potential for that mine and other sorts of mineral or resource impacts that BLM has proposed in some of its alternatives to affect water quality.</p>	<p>BLM shares your concern regarding water quality resources for the Pilgrim–Kuzitrin–Kougarok river system. Likely impacts for various alternative actions are discussed in Chapter IV, section B(1), "Air Quality and Soil and Water Resources." Any proposed development impacts would be considered in accord with the NEPA process. BLM manages the lands and the resource values through the NEPA process, which considers the resource values and allows the development of site-specific mitigation and the assignment of ROPs and stipulations as appropriate for the project. ROPs and stipulations are the minimum guidelines that will be used so resource issues will be mitigated, on a site-specific basis, during the Plan of Operations review and approval. Mineral related activities are required to follow BLM 3809 Regulations as well as Federal and State laws and regulations. There is flexibility built into the ROPs (Appendix A) so that site-specific analysis and subsequent remedial measures will be adapted to the particular proposed project.</p>

Letter # - Comment #	Comment	Response
24-11	<p>BLM did not portray groundwater characteristics for the entire Kobuk-Seward Peninsula other than references to Dorvara et al. such portrayal would be extremely exhaustive and BLM's portrayal that groundwater is lacking because of permafrost simply cannot stand. Benning, J. and D. Yang (2005) indicated that Nome and Barrow rain gauges which incorporate wind shielding resulted in a reported under catch of precipitation. They in turn developed an algorithm for adjusted precipitation. I wish to reference that report and urge BLM to consider its findings and adjust its characterizations about water resources.</p>	<p>We have added an additional groundwater reference (Miller et al. 1999) to the References Section. The reference provides an excellent description of groundwater characteristics for much of Alaska including the Kobuk-Seward Peninsula area. Chapter III, section (B)(5), "Water Resources," has been revised for clarification in the Proposed RMP/Final EIS. The purpose of the discussion of permafrost and groundwater in the Draft RMP/EIS was to inform the reader that permafrost presents unusual groundwater development and withdrawal problems. In general, permafrost inhibits infiltration of precipitation to underlying aquifers and promotes rapid runoff to streams. Although there is a large quantity of water stored in the permafrost, the water cannot be easily obtained and the presence of thick, continuous permafrost greatly limits the usefulness of most shallow aquifers. We agree that the algorithms and procedures employed by Benning and Yang (2005) for adjusting daily precipitation-catch measured by the U.S. National Weather Service (NWS) for wind-induced under-catch, wetting loss, and trace amounts of precipitation are important contributions to more accurate precipitation records for the Kobuk-Seward Peninsula area.</p>
52-18	<p>Pg. 3-5, 2nd full Paragraph: The mean annual temperature ...." How is the mean calculated? Is this a running 10 year, 20 year, or 30 year average? Without better explanation this statistic is not beneficial.</p>	<p>The wording in this paragraph (Chapter III.B.1) has been expanded for clarification: "The mean annual temperature in Alaska has increased about 2.7° F for the period of 1971 to 2000; the temperature increase was determined from the trend of the best-fit linear regression line through the 1971 to 2000 average annual temperatures for all representative Alaska stations (Alaska Climate Research Center, 2006)." In addition, the reference for this information has been updated. It may be of interest to note that "Mean annual-temperature" and "Normal annual-temperature" represent different statistical measures. The mean annual temperature for a particular year is the average temperature for January through December. Normal temperatures, on the other hand, by international agreement, are based on average annual temperature data for three consecutive decades. For example, normal annual temperatures reported by the NWS were calculated from stations with continuous data for the period 1971-2000. The next three-decade (30 year) normal annual temperature will represent the period 1981-2010. Departures from the normal annual temperature for a particular year are typically reported as an increase or decrease of X.X degrees from normal. Normal is the 30 year (three consecutive decades) moving average temperature for a particular climate station or area.</p>

Letter # - Comment #	Comment	Response
78-10	There should be an emphasis on wetland protection, as development has continued to erode the regional wetland quality and extent. This attrition of wetlands through time has been observed in all developed areas of the country and should be a high priority for permitting activities.	BLM has developed a number of Required Operating Procedures (ROPs) that deal specifically with protection of wetlands (Appendix A, section B.3: Water, Riparian, and Wetlands). ROPs are requirements, procedures, management practices, or design features that BLM adopts as operational requirements. These ROPs are applied both to projects BLM provides permits for, and also to projects BLM initiates for research, inventory, or monitoring. Appropriate ROPs apply to all permitted activities, including Federal Land Policy and Management Act (FLPMA) leases and permits, Special Recreation Permits, oil and gas operations, coal exploration, mining Plans of Operation, and Right-of-Way authorizations. The wetlands ROPs apply to situations such as: potential alteration of wetlands, road and trail construction in wetlands, use of low ground pressure vehicles in wetlands, hydrology of wetlands during vegetation treatments, and location of structures within wetlands.
197-11	All standards for Clean Water Act must be adhered to in any activity on rivers and streams.	Development, where allowed, will be subject to the ROPs and stipulations in Appendix A of the Proposed RMP/Final EIS which are the minimum guidelines that will be used to ensure that resource impacts will be mitigated, on a site-specific basis, during the NEPA process associated with the Plan of Operations review and approval. Additionally, commercial activities will be subject to permitting and consultation requirements under the Clean Water Act, and other Federal, State, and Local requirements.
<b>VEGETATION</b>		
58-11	pg 2-8. plans to complete land cover classification in NW Alaska: BLM [should] continue and accelerate its land cover classification and mapping in the northwestern portion of the State. The Point Hope, De Long Mountains and Point Lay quads are very important to caribou during post-calving, insect-relief and summer seasons. Also, in some years, a portion of the herd winters in these areas. Inventory and knowledge of vegetative classification will help identify areas that sustain the herd during the varying seasons of the year.	Vegetation mapping for all of northwest Alaska, including the U.S. Geological Survey topographic map quadrangles mentioned by the commenter exists at a one kilometer resolution. Vegetation mapping at a 30 meter resolution is not available for these three quadrangles. Access to more detailed habitat information will enhance management effectiveness for terrain important to caribou in these areas, including post-calving, insect relief, summer range, and occasional winter range use. The Proposed RMP/Final EIS lists completing land cover classification for these quadrangles in its list of inventory and monitoring projects, Chapter II.B(1)(b)(3)(a), "Inventory and Monitoring". RMP decisions drive project initiation and funding. Completion of this project will depend upon adequate funding and personnel.

Letter # - Comment #	Comment	Response
58-12	Pg 2-8: Vegetation transects [should] be established in calving and summer range areas [of the WACH] to allow trend analysis of quality and abundance of vegetation in these areas.	Due to priority given to monitor WACH winter range and its slow-growing lichen component, BLM has no information on condition and trend of habitat within WACH summer range, including calving grounds and insect relief terrain in the Arctic Foothills of northwest Alaska. One wildlife management decision common to all action alternatives (B, C, and D) of the Proposed RMP/Final EIS is to work cooperatively with the State and other Federal agencies to implement the WACH Strategic Management Plan. One objective of the Strategic Management Plan is to assess and protect important habitats of the WACH. BLM recognizes the need to develop and implement a project proposal to evaluate representative portions of WACH summer range occurring within the planning area. The timeframe to design and implement a study of this nature will be dependent upon adequate funding and personnel.
58-13	Pg. 2-8: BLM [should] continue to recognize and manage lichen-rich plant communities as unique habitats that are highly important to caribou. Lichen-rich areas in the Planning Area should be protected for the future benefit of the caribou herd. These habitats form essential and critical winter range for the herd.	BLM is strongly committed to managing and protecting lichen habitats of all types in recognition of their vital importance to caribou (Chapter II.B.1.b.). The ACECs in the Preferred Alternative of the Proposed RMP/Final EIS recognize caribou and caribou habitat as components of the landscape deserving of special management attention. These ACECs are: Nulato Hills, Western Arctic Caribou Insect Relief Habitat, Ungalik River, Inglutalik River and Shaktoolik River. The Preferred Alternative for these proposed ACECs variously require focused, activity level management plans to guard against adverse impacts of permitted resource development; develop fire management prescriptions for caribou winter range; and some close the ACEC to all forms of livestock grazing.

Letter # - Comment #	Comment	Response
58-14	Pg 2-8: Fire suppression techniques [should] be implemented to protect old growth lichen on caribou winter range within the Planning Area. Recent information shows that caribou do not select (avoid) burned lichen stands for long periods of time (50-100 years) after lichen areas are burned. Loss of old-growth lichen should be avoided.	Based on mapping products from ADF&G and BLM's Alaska Fire Service, approximately 19% of WACH winter range within the planning area has burned since 1950. We know that after 24 and 25 years, at vegetation transects in lichen tussock tundra in the Buckland River valley and McCarthy's Marsh lichen cover in burned areas remains less than 4%, indicating slow recovery rates after fire. At a linear rate of recovery, lichen cover would still be less than 7% at 50 years post-fire. In contrast, lichen cover values at typical, unburned lichen tussock tundra or lichen mat-lowland tundra can be 25-50% or 50-75%, respectively. Recent findings from a study in eastern Alaska showed that caribou from the Nelchina herd strongly selected against burned areas less than 35 years old throughout the winter, and that lichen availability was a large factor influencing habitat selection. What we don't know is where and how much old-growth lichen habitat is available to the WACH. Based on a regional inventory (yet to be conducted) of location and acreage of lichen-rich tundra, woodland, and alpine habitats, fire management goals could be developed to reflect the present size and needs of the WACH and its users. WACH winter range could be managed for long fire return intervals. For example, it may be necessary to suppress fires in old-growth lichen habitat when the threat of very large fires is great, and supply of alternative winter range is limited. Prior to an inventory of this type, on a case-by-case basis, potential very large fires in WACH winter range could be assigned a Full site designation, and fought with a high level of committed resources. Additionally, under Alternatives C and D in the Proposed RMP/ Final EIS, a management plan developed for the Nulato Hills ACEC would address fire management options in lichen habitat of WACH winter range. Similarly, under Alternatives B, C, and D management calls for managing fire to protect old growth lichen stands on the Seward Peninsula. Chapter II.B.1.b)(3).
58-15	Pg 2-8: BLM [should] continue to recognize and manage multi-aged lichen stands for the benefit of caribou within the Planning Area. This management strategy ensures that, through time, lichen stands will mature to old-growth quality and help perpetuate quality caribou range for the herd. Since lichens mature slowly, the view for range quality and their usefulness to the herd should be measured by centuries and not by decades or shorter periods of time.	See response to comment # 58-13. BLM, was designated in 1946 – only 60 years ago. It is hoped that BLM's ability and commitment to manage and protect caribou as well as important caribou habitat will be as strong in 2106 as it is in 2006.

Letter # - Comment #	Comment	Response
64-32	The discussion in the text on broad-scale vegetation classification does not include a citation for development of the various vegetation types found on BLM lands within the plan. We assume the vegetation classes were adapted from The Alaska vegetation classification by Viereck, et al., 1992. If this is the case, please cite the following: Viereck, L., C. Dyrness, A. Batten, and K. Wenzlick, 1992. The Alaska Vegetation Classification. General Technical Report PNW-GTR-286. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, OR.	The one kilometer resolution vegetation classification used was not based on Viereck et al. (1992). As stated in Chapter III.B.6.a) the data used was a statewide vegetation classification developed by M.D. Fleming (1996). It was presented at the Second Circumpolar Arctic Vegetation Mapping Workshop in Arendal, Norway (May 1996). Additionally, this data was used by the U.S. Geological Survey at the EROS Data Center in Anchorage to develop a more widely known land cover map product (USGS 1997) that has been extensively used by the BLM-Alaska Fire Service in their fire fuels reduction program. The Fleming 1996 citation was added to the legend of Map 3-6.
<b>FISH AND WILDLIFE</b>		
<b>FISH</b>		
11-1	Keep lands (Ungalik River) closed to mining as this would affect the fish and animals. Disturbances can and have been instrumental in fish not returning and having abnormalities.	In the Preferred Alternative of the Proposed RMP/Final EIS, the Ungalik River would be open to mineral location and leasing subject to strict required operating procedures outlined in Appendix A.
11-2	Keep lands (Ungalik River) closed to mining as this would affect the fish and animals. Same with caribou, moose and other animals.	Thank you for your comment. See response to comment #11-1.
19-1	[with] mining we've got to be very careful on that because if we just disturb the land there won't be fish in that river or they'll move somewhere else.	BLM will continue to attempt to mitigate any adverse effects to fish habitat (and therefore populations) due to authorized actions on BLM-managed lands.
24-3	Our fish resources are, have been on the decline for a long time and I don't know that any additional impacts of the caliber that's indicated in the Alternatives is warranted.	Salmon production is cyclical and varies according to numerous environmental factors. Salmon returns have been strong to record breaking in Norton Sound the past 3 years after declining through the 1990s. Chum salmon returns are still somewhat lacking, but most likely are determined by ocean conditions.

Letter # - Comment #	Comment	Response
24-12	BLM's portrayal of fish species is largely inadequate. I use each of the listed species for subsistence each year and also use saffron cod and Arctic cod in addition to those listed by BLM. The cod species have a tendency to migrate into large estuaries and I feel their lack of mention in the RMP/EIS should be corrected to reflect that they migrate into onshore estuaries that may be or become managed by BLM.	The Fisheries analysis in the plan is mostly based on fish habitat, because BLM manages fish habitat and is only responsible for fish populations in Federal Conservation Units and non-navigable waters. BLM has no management responsibility in areas where Safron and Arctic Cod "have a tendency to migrate." BLM typically manages upper watersheds within the planning area.
24-14	In consideration that each lake may hold genetically isolated char, it seems a listing with the Endangered Species Act is warranted and it seems peculiar that BLM did not make inferences to listing since each species is very likely sensitive.	BLM has identified the Kigluaik char as a BLM Sensitive Species, meaning that we will treat the fish as though it were a candidate for listing. To list the fish under the Endangered Species Act is the responsibility of the U.S. Fish and Wildlife Service and is outside the scope of this plan. We are currently undertaking project work to determine fish population numbers in the largest of the Kigluaik Lakes. We believe that listing as threatened or endangered is premature until we can determine the population trend. We will continue to work closely with ADF&G, and propose fishing regulation changes to protect the char, if warranted. See response to comment # 65-67.
26-2	I believe you also have relic stocks of arctic char in the headwaters of the Koyuk River just north of Mount Aust for the same reason. And while working for the Park Service, I did some work out there and found one of those relict stocks in the Kuzitrin Lake.	BLM needs to survey these areas to determine the presence of these char. Collection of genetic samples would help determine if the char are unique or belong to the more common Taranets char sub-species grouping.
26-7	I think the Shaktoolik, Ungalik, Inglutalik, and East Fork of the Koyuk all have very rich salmon and fisheries habitat. I can say that from many years of experience surveying those streams for the Fish and Game.	The Nulato Hills contain some of BLM's most productive salmon and fish habitat. BLM will continue to protect this valuable natural resource through implementation of the ROPs, monitoring, and the NEPA process. This area is proposed for designation as an ACEC in the Proposed RMP/Final EIS, Chapter II.B.3.a).
65-55	The draft RMP offers no explanation for how the 300-foot setbacks were determined.	An explanation of how the setbacks were determined was added to Chapter III.B.7.a)(3), "Factors affecting Fish Production."
65-56	BLM [should] adopt more stringent watershed-based stipulations to help maintain riparian habitat.	Thank you for your comment. See response to comment # 78-10.



Letter # - Comment #	Comment	Response
65-67	BLM must work with ADF&G and the State Board of Fisheries to protect Kigluaik arctic char by enacting fishing regulations, if warranted. However, BLM does not specify in the draft RMP as to what regulations may be undertaken to ensure sustainable populations of arctic char.	ADF&G is responsible for managing populations. BLM will work with ADF&G and the Board of Fisheries to protect the habitat for this species. Development of fishing regulations is outside the scope of the RMP.
65-68	[Alternative C] which would expand protections for the Kigluaik Mountains and prohibit disruptive locatable and leasable mineral entry, [is] the best management practice for arctic char populations.	BLM will continue to study the Kigluaik Mountain arctic char in an effort to better protect this valuable natural resource. The Proposed RMP/Final EIS implements several protective measures for arctic char populations in the Kigluaik Mountains, Chapter II.B.(1)(d)(3). and Appendix A.
65-69	McCarthy's Marsh and Kuzitrin River provide marshy habitat which offer warmer water temperatures that support the growth of fish species. The fish in these areas stand to be impacted from prospective mining activities...Draft RMP/EIS, at 3-48. As such, it seems imperative that BLM prohibit energy development and limit exploitation in or near these habitats by according the proper protections for a watershed-based approach to managing fishery habitat.	Approximately 70% of McCarthy's Marsh was conveyed to the State of Alaska in 2006. The upper Kuzitrin and lands in McCarthy's Marsh remaining under BLM management will be open to mineral entry and leasing subject to the Required Operating Procedures (ROPs) in Appendix A and all appropriate Federal and State regulations. The ROPs and regulations provide BLM with the management flexibility to protect fish habitat when and if energy development were to occur.
65-106	All proposed/recommended 300-foot riverbank setbacks (for both locatable and leasable mineral management) should be "minimum" setback distances and ... the BLM [should] explain how they arrived at 300 feet for an adequate riverbank setback.	Thank you for your comment. See the response to comment #65-55.
65-107	Setbacks and closures should also be applied to tributaries of the main rivers identified in the draft RMP.	Oil and gas leasing stipulation #2 prohibits permanent facilities within 500 feet of fish bearing water bodies. This stipulation applies to all rivers in the planning area. Most of the ROPs apply to all streams and rivers (Appendix A, Proposed RMP/Final EIS).

Letter # - Comment #	Comment	Response
66-5	<p>Providing an adequate buffer around rivers and streams provides protection for fisheries resources by conserving the delicate riparian areas, which help prevent erosion and flooding. It is also important to preserve the river substrate from disturbance because of its relationship to spawning fish, and because of the threat of decreased water quality for developing juvenile fish due to silt deposits from disturbed sediments. Protecting water flow patterns and water quantity within a river system is also important to preserving fish populations.</p>	<p>Required operating procedure (ROP) FW-7a requires that a claimant, operator, or applicant proposing to use or develop the lands, waters, or resources within 300 feet of the banks of active stream channels must demonstrate that such use or development will not adversely alter the condition and ecological function of aquatic and riparian systems. Several other ROPs in Appendix A, section 3, "Water, Riparian, and Wetlands" pertain to protect of aquatic, riparian, and wetland habitats. See also response to comment # 65-107.</p>
197-7	<p>Pg. 2-40: While 300-foot setbacks from certain rivers and streams may be adequate, these setbacks are inadequate in areas that are important moose habitat or fish spawning areas and therefore additional setback protections should be set aside to protect these habitats. Consultation with ADF&amp;G and local knowledge must be considered in these cases.</p>	<p>The 300-foot setbacks discussed in the Draft RMP/EIS are measured from either side of the mean high water mark, creating a 600-foot buffer around the mainstems of the rivers. This should be adequate for fish habitat protection in the listed drainages. Any Federal actions proposed near critical fish habitat within the planning area will be conducted in a manner which minimizes damage to the aquatic environment. ADF&amp;G will be consulted if necessary.</p>
<b>WILDLIFE: Western Arctic Caribou Herd (WACH)</b>		
15-8	<p>We commend BLM for identifying the herd's most important habitats and proposing to establish Areas of Critical Environmental Concern (ACEC) to protect them. However, opening these areas to mineral development, especially solid leasable minerals, as proposed under Alternative D, is a concern. It is uncertain whether the effects of large-scale surface development and associated infrastructure in these areas could be adequately mitigated.</p>	<p>Thank you for your comment. See response to comments # 65-36, # 65-108 and # 65-70.</p>

Letter # - Comment #	Comment	Response
15-9	[P]otential impacts to the WAH and the subsistence communities that rely on it would be substantially reduced if areas designated as ACECs for the herd were deferred from leasing for oil and gas or other mineral development. If, however, any acreage within these WAH ACECs is opened to mineral development, stipulations and required operating procedures (ROPs) similar to those for oil and gas exploration should be developed for mining activities.	The Proposed RMP/Draft EIS does not defer oil and gas leasing within the proposed ACECs. It does, however, apply ROPs and Oil and Gas Leasing Stipulations (Appendix A) to protect important historic, cultural, fish and wildlife, and scenic values identified within the respective ACEC. The Proposed RMP/Final EIS does defer coal leasing - see response to comment # 65-70. The ROPs also apply to any surface disturbing activities, including mining. Additional NEPA evaluations, including mitigation measures, will be developed as needed in response to site specific applications for mining or oil and gas activities.
15-10	In the case of hard rock mining, or any other activity requiring an Operating Plan, wording should be added in the Final RMP/EIS to clarify that not only must the plan(s) be completed, but they must be approved by BLM, in consultation with the Western Arctic Caribou Herd Working Group, based on the plan's ability to ensure all potential impacts of the proposed activity on caribou will be adequately mitigated and cumulative effects considered before project activities commence.	Mining plans of operation must be approved by BLM before on the ground activity begins, as stated in the Proposed RMP/Final EIS in Chapter II, Section B.2.c)(2)(c), "Management Common to all Action Alternatives." Proposed mining plans of operation would be subject to NEPA analysis and the Working Group may provide input and recommend mitigation measures during this process. In addition, the proposed mining activity would be subject to the ROPs (Appendix A).
15-11	Aircraft altitude restrictions should be made more enforceable. Cloud ceilings on the calving grounds during calving are rarely 2,000 ft or higher. "Safe flying practices" would require pilots to stay free of clouds unless flying under instrument flight rules, which is not likely for development operations in this area. It seems likely that the "exception" noted in this ROP would become more common than the rule. Therefore, we recommend that...The BLM should prohibit flights below 1,500 feet over the WAH calving area during the calving period except for authorized research activities or in the case of emergency.	This ROP was adopted to be consistent with the adjacent National Petroleum Reserve-Alaska. The stipulation includes the exception: "unless doing so would endanger human life or violate safe flying practices." to address the safety issue raised by the commenter. See also response to comment # 58-31 (under Process_General).

Letter # - Comment #	Comment	Response
15-20	[T]he Draft Preferred Alternative (Alternative D) could be improved to better protect fish, wildlife and subsistence resources if the following recommendations are incorporated in the Final RMP/EIS. 2. All Rights of Way requests for WAH ACECs should be reviewed by the BLM in consultation with the Western Arctic Caribou Herd Working Group, and measures developed to prevent or mitigate any impacts.	All right-of-way applications (ROW) will be reviewed by BLM and analyzed under NEPA for impacts to wildlife and subsistence. Appropriate mitigation measures and stipulations will be incorporated into the ROW permit to mitigate impacts to the extent possible. Table 2-1 of the Proposed RMP/Final EIS states that appropriate mitigation measures for linear ROW in caribou habitat would be developed through activity level planning. The WACH Working Group may provide input and recommended mitigation measures on site-specific ROW applications during processing of permits and NEPA analysis as well as providing input into the development of activity level plans for caribou habitat.
24-4	[In] the southern end of the RMP area, from myself going to that area, [I have observed] there is significant evidence that caribou use that area where people do not generally access and it's likely important for those animals and for subsistence users who would use that area.	BLM recognizes that the southern Nulato Hills is important winter habitat for the WACH. This area is proposed for designation as an ACEC in the Proposed RMP/Final EIS Chapter II.B.3.a).
25-1	We have an unregulated number of transporters coming in, placing an unlimited number of hunters in multiple locations at throughout the migration. And so there is a biological concern in that regard. Because the Western Arctic Herd is so large right now, it is hard to confront this problem strictly on biological terms.	The largest block of BLM-managed land within the major migration routes of the WACH is the Squirrel River watershed. A Recreation Area Management Plan will be developed for this area to address these concerns. See Chapter II.B.2.d)(6).

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25-4	We are looking at on a broader scale, global warming. We don't know what the effect is going to be but we are already seeing effects in our wildlife here. We have the persistent organic pollutants that are becoming more and more dominate up here. So, this herd [WACH] is under a lot of stress or it is potentially under a lot of stress. And when you look at the development potential on adjacent lands, including the National Petroleum Reserve, I think we need to be very cautious about this most important herd that affects so many people, subsistence users in this region.	The Proposed RMP/Final EIS recognizes the potential for cumulative impacts to the WACH and their habitats in Chapter IV.B.3.b) and B.G.2.c)(2). It includes measures to protect caribou habitats in several sections of Chapter II and Appendix A.
25-7	I prefer Alternative C, but recommend increasing the 300' setback as described for [mineral development] (2-42). The southern Nulato Hills are extremely valuable winter habitat for the Western Arctic caribou herd, and maximum protection should be provided to allow winter use by caribou.	The 300-foot setback in Alternative C was designed primarily to protect riparian and fish habitat, not caribou habitat. See also response to comment # 24-4.
34-1	If we start selling all this land. If all those people from out of town or out of the region start buying land, you'll start seeing lights out there. There'll be lights in the mountains and the valleys. That's where all our caribou and all our birds migrate through. ...Those people they gonna block off all that caribou trails where they go through ours and they'll start finding another route. Where we won't see our caribou again.	Very few lands would be available for disposal. Any lands remaining in BLM management in the immediate vicinity of Nome and Kotzebue would be available for disposal through FLPMA sale. However, we anticipate that almost no BLM lands will remain in these areas after conveyances are completed. Once conveyances were completed, large blocks of BLM land identified on Map 2-18 would be retained in Federal ownership.

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49-1	That's one of our concerns, the Kauk River. How many guides is the problem. Or number of animals or transporters that the hunters allowed out there. And the time [of year]. If they start doing it [guiding and hunting] at the wrong time, they [the caribou] go the wrong way. One or two weeks would make a big difference [in the effects on caribou migration].	The Proposed RMP/Final EIS includes recommendations for managing commercial recreational use permits in the Extensive Recreation Management Area which will allow us to address issues such as the Kauk River.
50-2	Transporters or guide hunters turn the caribou before they reach here [Buckland].	Thank you for your comment. See response to comment # 49-1.
51-1	EPA has concerns regarding potential adverse impacts to important caribou calving and insect relief habitat for the Western Arctic Caribou Herd (WACH) resulting from resource exploration and development in the area. Additional management measures and monitoring are recommended to ensure the compatibility of uses.	Thank you for your comment. See response to comments # 15-11, # 65-36, # 65-70, and # 65-108.
52-9	Pg.2-53. 6. Alternative D: "About 60%" is incorrect. According to Table 2-9, 8% of the BLM managed land would be closed to provide additional protection to caribou habitat in the Nulato Hills.	Thank you for your comment. The acreage figure referred to has been corrected.
52-10	None the less, 8% (250,000 acres) is a huge area, far larger than should be closed. There is no demonstrated need for such a large closure.	The area is currently closed to leasing under a public land order. In the Proposed RMP/Final EIS, the area would be open to exploration subject to the ROPs and oil and gas leasing stipulations.

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54-4	Western Arctic Caribou herd - Over 500,000 animals make an annual migration from the North Slope down to the Nulato Hills and Seward Peninsula area. This animal herd is important to the native peoples in this area. It is also important to other animals as a major sustaining part of the food chain. This falls under the Alaska Dept. of Fish and Game's scope of responsibility, but it also falls under the responsibility of the land owner.	BLM recognizes the importance of the WACH for subsistence. The Proposed RMP/Final EIS includes measures to properly manage and monitor caribou habitats in Chapter II.
57-1	Protecting sensitive calving areas, summer grounds, and wintering habitat for the Western Arctic Caribou Herd (WACH) should be the highest priority. The health and safety of this extraordinary 500,000 caribou herd, Alaska's largest, would be threatened by opening up new areas within the herd's range to mining, oil, and gas activity.	Thank you for your comment. See responses to comments # 54-4 and 130-1.
57-3	I support the proposed Area of Critical Environmental Concern designations in Alternative C because they accord real protection for the WACH Calving and Insect Relief Habitat as well as the WACH Winter Range.	Thank you for your comment. Several of these ACECs would be designated in the Proposed RMP/Final EIS. However, management decisions differ somewhat than that outlined in Alternative C. See Appendix B.

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58-1	We strongly recommend that the BLM and Department of Interior prioritize the long term health and maintenance of the Western Arctic Caribou Herd and the habitats upon which it depends within the Planning Area to ensure the health of the herd and subsistence opportunities for the communities of northwestern Alaska. Maintaining productive caribou habitat and working closely with communities in northwestern Alaska and the Working Group should be a high priority for BLM's Kobuk-Seward Peninsula planning process.	BLM has prioritized the long-term health and maintenance of the WACH and its habitat. See response to comments # 116-1, # 58-13 and # 197-17
58-2	The Habitat Element of the Plan [WACH Cooperative Management Plan] also considers wildfire management and encourages resource management agencies to fully understand how wildfire affects the range condition and thus future management and conservation of the herd. The Working Group recommends wildfire management strategies that protect lichen habitats found on seasonal ranges, especially winter range.	Thank you for your comment. See response to comment # 58-13 and # 97-22
58-4	BLM [should] continue to work cooperatively with State and other Federal Agencies to help inventory and monitor habitats and populations of the WACH.	BLM will continue to work cooperatively with the State and other Federal agencies to help inventory and monitor habitats of the WACH as outlined in Chapter II, section B(1)(c)(3), "Management Common to All Action Alternatives."
58-5	Conservation and protection of migratory routes and seasonal ranges used by the [Western Arctic Caribou] herd is an important tool to be used in managing the future well-being of the WACH. [BLM should] minimize impacts of human activities on the WACH and the habitats associated with seasonal ranges used by the herd.	The Proposed RMP/Final EIS includes numerous management recommendations that will minimize impacts to caribou habitat. See responses to comments # 197-6, # 197-8, # 78-2, # 116-1, # 58-13, and # 58-6.



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58-6	Protection of caribou winter ranges is an important conservation tool to be used in managing the WACH; and [BLM should] preserve and protect the Nulato Hills as critical winter range of the WACH; and the Working Group nominates the Nulato Hills as an area of critical habitat of environmental importance in the Kobuk-Seward Peninsula Planning Unit.	This area would be designated as an ACEC in the Proposed RMP/Final EIS, Chapter II.B.3.a) and managed as important habitat for the WACH.
58-18	pg 2-11 and pg 2-12 Alternative C: This alternative is the best alternative presented, however it fails to designate seasonal migration corridors. Habitat protection is essential to maintain the WAH ... We strongly recommend that this alternative be modified to include migration corridors and that all of these seasonal core habitats be provided permanent protection. This will ensure that opportunity for human uses of Alaska's largest caribou herd are sustained for the 40 Native villages that depend on the herd and the other people who also use and appreciate this herd.	Thank you for your comment. See responses to comments # 78-2, # 197-6, and # 197-8.
58-19	pg 2-11 and pg 2-12 Alternative D to designate calving, insect relief and core wintering habitats; include an activity plans for calving, insect relief, core winter habitat; stipulations for calving/insect relief/linear ROW and winter range fire management (see table on pg 2-12). The Working group does not support this alternative because we strongly oppose development in these core seasonal habitats. We support strong, science-based stipulations to protect caribou and other wildlife throughout other areas of the planning area as long as the core seasonal habitats are permanently protected.	Thank you for your comment. See response to comment # 73-1, # 58-34, # 65-89, # 58-22, and # 58-37.

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58-22	The Working Group strongly recommends that mining within seasonal ranges of the caribou herd (e.g., summer calving and insect relief habitats, winter habitat, and seasonal migratory corridors) remain out of the scope of the Draft RMP/EIS, primarily because of the area's significant habitat values for the WAH.	Mining is a legitimate activity on public lands and is within the scope of the Proposed RMP/Final EIS. Caribou habitat will be protected through the implementation of the ROPs and through mitigation developed during site-specific NEPA analysis.
58-23	Additionally, stipulations must be developed and implemented to prevent localized and/or broad scale contamination of vegetation, drainages and habitats used by caribou in other portions of their range outside the protected habitats described above. Strict adherence to abatement of fugitive dust in mining activities must be stipulated.	The ROPs in Appendix A of the Proposed RMP/Final EIS apply to all permitted activities. These address potential contamination of vegetation and water. Additional mitigation can be developed on specific mining plans to deal with fugitive dust.
58-27	BLM should provide permanent protection for the entire range of the WAH and close the area to mineral exploration and development. In addition, the WAH insect relief and calving areas should be closed to all mineral exploration and development activities under all of the alternatives considered. Seasonal restrictions are not sufficient, as activities in other parts of the year may impact the quality of the habitat year round.	NEPA requires that BLM consider a reasonable range of alternatives during impact analysis. Closing WACH insect relief habitat to all mineral exploration and development under all alternatives would not represent a reasonable range of alternatives. See also response to comments # 58-22, # 58-40, and # 78-8.

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58-32	Caribou habitat protection should be a high priority in the Planning Area. No development should occur in the core seasonal habitats. Related to caribou, the primary objective should be preventing disturbance to caribou as they engage in their annual seasonal movements and range use. If hard rock mining is permitted, it should not be allowed within the primary calving ground (90% kernel analysis)(Figure 2), critical insect relief habitat (75% kernel analysis) (Figure 3C), migratory corridors in central Unit 23 (Figures 4 and 5), and winter range in the Nulato Hills. These seasonal ranges must be protected and should be considered ROW exclusion areas.	Thank you for your comment. See response to comments # 58-22 and # 15-20.
58-44	The Draft RMP/EIS should identify and describe sensitive caribou habitats and movement corridors within the Planning Area. Maps of the caribou habitats and movement corridors should be included in the Final RMP/EIS.	Map 3-12 of the Proposed RMP/Final EIS identifies caribou habitats as defined by Alaska Department of Fish and Game. Map 3-46 shows fall migration patterns.
58-46	In the Draft RMP/EIS Alternatives A, B, and D will allow resource development activities within sensitive caribou habitats and movement corridors within the Planning Area. A risk analysis should be conducted for the WAH similar to that prepared for the Porcupine Caribou Herd within the Arctic Refuge Coastal Plain (see Griffith et al. 2002).	Potential impacts from these activities will be minimized through the implementation of ROPs and, in the case of oil and gas, leasing stipulations. Site-specific mitigation measures will also be developed during project design.

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58-47	In the Draft RMP/EIS each alternative will allow industrial exploration and development activities within the Planning Area. The Draft RMP/EIS should explicitly describe what measures will be taken to protect sensitive caribou habitats and movement corridors and how those measures will be monitored and enforced.	The Required Operating Procedures and Oil and Gas Lease Stipulations (Appendix A) describe what measures will be taken to protect sensitive caribou habitat and movement. BLM would conduct monitoring inspections of construction, drilling, and rehabilitation operations, through a compliance officer and/or interdisciplinary team, to ensure acceptable attainment of objectives.
58-73	pg 2-105 WAH calving grounds & pg 2-105 WAH insect relief habitat: Overall, the Working Group supports many of the ACEC designations for critical WAH habitats outlined in Alternative C. The Working Group supports Alternative C designating calving grounds, insect relief areas, and winter habitat in the Nulato Hills as ACECs in the Planning Area. In addition, migratory areas as depicted in Figure 4 and 5 should also be considered as an ACEC in the Planning Area.	Support for designation of WACH habitats as ACECs is noted. See response to comment # 58-76 regarding designation of migration routes as ACECs.
58-74	The proposed ACECs do not provide meaningful protective measures for calving grounds, summer insect relief habitat, or winter range in the Nulato Hills.	The designation as an ACEC in and of itself does not confer any additional protection other than the requirement for a mining plan of operation. In conjunction with the ROPs, Stips, and Federal, State and local regulations, the ACECs will provide meaningful protective measures for caribou habitat.
58-80	Under Alternative D, development would be allowed in the southern Nulato Hills - critical winter habitat for the WACH. The only regulatory measure would be prohibiting mineral entry with 300 feet of the river. Allowing infrastructure associated with locatable mineral entry 300 feet from habitat (pg 2-107) is insufficient and will not ensure sustained wintering populations of caribou.	This is not the only regulatory measure that would apply. Permitted activities would be subject to all applicable Federal and State regulations. The ROPs in Appendix A of the Proposed RMP/Final EIS apply to all permitted activities within the Planning Area and would therefore apply to any proposed activities in the southern Nulato Hills. See also responses to comments # 15-20 and # 66-3.

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65-36	The cumulative analysis ... provides a more accurate picture of what the actual effects of actions on the lands will be, and so a determination that the calving grounds or insect relief habitat of the WACH might be threatened is of major concern. Because the WACH is such an important subsistence source for so many people...these concerns are especially important and warrant further review in the Final RMP/EIS.	BLM recognizes the importance of these habitats. The WACH insect relief habitat is a proposed ACEC in the Proposed RMP/Final EIS (Chapter II.B.3.a). In addition, a habitat management plan would be developed for the area before fluid mineral leasing would occur. Coal leasing has been deferred and the RMP would need to be amended before coal leases were issued. A mining plan of operations would be required before any locatable mineral activity could occur in the ACEC. Additional site-specific mitigation to protect caribou and their habitat could be developed at that time. All mining activity in the ACEC would be subject to the ROPs in Appendix A.
65-70	[M]ineral development is not an activity that is compatible with sensitive caribou habitat or the goals of the proposed WACH Calving and Insect Relief Habitat ACEC. Coal development in this region could affect availability and access to insect-relief terrain. Coal mining could result in a major industrial development and transportation infrastructure within the concentrated calving area and would bisect major caribou movement corridors.	The coal screening process (43 CFR 3420.1-4) has not been conducted in the planning area; therefore coal leasing is deferred. If an application for a coal lease should be received in the future, an appropriate land use and environmental analysis, including the coal screening process, would be conducted to determine whether or not the coal areas are acceptable for development and for leasing under 43 CFR 3425. The Kobuk-Seward Peninsula RMP would be amended as necessary.
65-94	Right of way exclusion areas should include all critical habitat for the WACH designated by ADF&G, including important migratory pathways.	Thank you for your comment. See response to comments # 15-20 and 197-6.
65-108	It is not clear from the RMP/DEIS if the restrictions such as seasonal constraints and closing selected areas will prove to be sufficient to protect critical fish and wildlife habitat... [particularly] the migratory routes and core habitat for the Western Arctic Caribou Herd.	BLM believes that the RMP/DEIS process it has followed is appropriate, legal and sufficient. BLM gathered important local and scientific knowledge and constructive public comment, and used this information to form a Preferred Alternative which balances competing resource values and interests in a responsible manner. The commenter has failed to provide details or a basis to support the claim that BLM's ROPs and Oil and Gas Stipulations may prove to be insufficient to protect fish and wildlife habitat.
65-109	BLM should provide permanent protection for the entire range of the WACH and close the area to mineral exploration and development.	BLM recognizes the importance of these habitats for the WACH. Appropriate ROPs and Stips (Appendix A) will be applied to projects proposed in these areas to minimize impacts and protect habitats.

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66-3	Improperly regulated development has the potential to affect the migration patterns or feeding areas of caribou, which would negatively affect subsistence users.	The Proposed RMP/Final EIS would allow BLM to properly regulate development within caribou habitats through application of the ROPs and Stips. If needed, additional mitigation measure could be developed on a site-specific basis when and if applications for development are received.
67-5	I am very concerned that mineral exploration and resource development not be allowed to adversely impact the habitat essential to this herd [WACH]. While a single development may not present significant impacts it is important to consider the cumulative impacts of multiple projects. I have read the comments submitted by the Western Arctic Caribou Herd working Group and share their concerns and support their recommendations.	The Proposed RMP/Final EIS recognizes the potential for cumulative impacts to the WACH and their habitats in Chapter IV.B.3.b) and B.G.2.c)(2). It includes measures to protect caribou habitats in several sections of Chapter II and Appendix A.
68-1	The priority in your planning effort should be to protect and enhance wildlife resources, particularly the Western Arctic Caribou Herd (WAH). As you know, the WAH numbers nearly a half million animals and is an extremely important subsistence resource for many people from over 40 villages. It is very important to minimize development in the northern parts of the planning area that are used for calving and insect relief.	The Federal Land Management and Policy Act (FLPMA) requires that BLM manage for multiple use and sustained yield. Multiple-use includes responsible development. BLM policy is to generally make public lands available for multiple use, while providing protection of natural resources. The Proposed RMP/Final EIS includes many provisions for maintenance, protection, and enhancement of wildlife resources. It attempts to strike a balance between multiple use and resource protection.
68-2	[Caribou] migration routes between the summer and winter areas must not be blocked.	When and if BLM receives any applications for linear ROW through caribou migration routes, impacts to caribou will be considered and mitigated to the extent possible. Facilities will be designed so as not to impede caribou movements.

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73-1	As a people who are still highly dependent on subsistence resources, we are alarmed by the fact that the critical caribou habitat--the calving grounds, the insect relief areas, the migratory routes, and the wintering areas of the Western Arctic Caribou--are all simultaneously planned to be opened for industrial development (coal mining, hard rock mining, oil & gas leasing, along with the potential roads, power lines, pipelines, buildings and support facilities), in the preferred alternative plan "D".	The Proposed RMP/Final EIS recommends that ANCSA 17(d)(1) withdrawals be revoked (see response to comment # 52-7). Once revocation is complete, these areas will be available for mineral entry and development. The RMP/EIS has taken a hard look at the impacts of the various activities that may take place during the life of the plan. BLM believes that the process it has followed is appropriate, legal and sufficient. BLM gathered important local and scientific knowledge and constructive public comment, and used this information to form a Preferred Alternative which balances competing resource values and interests in a responsible manner. The plan implements a number of Required Operating Procedures and oil and gas lease Stipulations to mitigate impacts identified in the plan. Coal leasing has been deferred - see response to comment # 65-70.
73-2	[T]he economic and social benefits of opening critical habitat areas of the State's largest caribou herd to development are highly questionable... we do not believe that plan is a truly balanced approach to incorporate other user groups that rely upon the health of the Western Arctic Caribou herd.	Thank you for your comment. See response to comment # 73-1.
78-2	There is a need to extend ACECs to major caribou migration corridors, which have been shown to exist from the caribou collar program that ADF&G has been carrying out in the region since 1998.	ACECs will not be extended to the major caribou migration corridors. Migration corridors are not well defined. Caribou may migrate through any part of the Planning Area in any given year. See also response to comments # 197-6 and # 58-76.
78-11	There is currently enough information to identify significant migration corridors and these should be identified in the document, including language in all items that have an impact to the integrity of these corridors.	Available information on fall caribou migration routes has been provided on Map 3-46. The information presented on this map represents a very limited data set and may not accurately reflect major migration corridors. See also response to comment # 197-6.

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78-12	Transportation corridors and extractive development should be planning accordingly with the migratory needs of caribou at the forefront of considerations, in addition to calving areas and insect relief areas.	No transportation corridors are defined in the Proposed RMP/Final EIS. Impacts on caribou will be considered and mitigated to the extent possible during processing of right-of-way applications. See response to comment # 15-20 and 197-22.
78-13	Identification and protection of old growth lichen stands is also necessary to managing this critical habitat for the needs of caribou.	Chapter II.B.1.b(3) "Vegetation, Management Common to All Action Alternatives" includes several management decisions related to protection of lichen. See response to comment # 197-22.
116-1	We request/support designation of ACECs proposed for approximately 2 million acres of core winter range in the Nulato Hills as specified in Alt. C and 2.9 million acres of sensitive WACH calving grounds and summer insect relief habitat within the Lisburn Peninsula, as specified in Alt. C. ...We favor provisions that would protect valuable caribou and anadromous fish habitat such as prohibiting disruptive locatable and leasable mineral entry on selected lands and applying common-sense seasonal limits on OHV use.	Both these areas are recommended for ACEC designation in the Proposed RMP/Final EIS, Chapter II.B.3.a). A limited OHV designation will apply to these areas. These areas will be open to mineral entry and location. Impacts from mining or leasing will be minimized by implementing the ROPs. In addition, any locatable mineral activity would require that a mining plan of operations be approved by BLM before any activity begins.
130-1	Mining, oil drilling and gas development poses serious threats to the livelihood of the Western Arctic Caribou herd and the culture of Alaska Natives.	Potential impacts from these activities will be minimized through the implementation of ROPs and, in the case of oil and gas, leasing stipulations. Site-specific mitigation measures may also be developed during project design.



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197-6	Pg. 2-12 and Table 2-1: Protection of the four main caribou migratory trails identified by ADF&G must be included in the caribou habitat management plan. Caribou is the major food source for the people of this region and top priority must be given to its critical habitats.	Caribou migrate across a broad front that includes all of Kotzebue Sound and in some years, even extends east of the Dalton Highway. This area covers a multitude of landowners. Each autumn caribou migrate southwest as they leave their summer range and move toward wintering areas. Even so, fall migrations may vary substantially in both space and time from year to year. The data we do have reveal that other routes appear to get more usage than BLM-managed land. Fall caribou migration paths based on satellite collars (PTT) deployed between-1987 and 2004 is shown on Map 3-46. The data on this map represent 251 caribou years and was collected during a period when the herd was very large. The proportion of total WAH caribou fitted with a PTT during any individual year was miniscule. This map shows some migration across BLM land in the Squirrel River. The Preferred Alternative of the Proposed RMP/Final EIS is to develop a specific management plan for the Squirrel River (Chapter II.B.2.d) One of the issues to be addressed in this plan is the impact of recreation on caribou migration.
197-8	Pg. 2-46. Migratory routes of the WACH must be included in the No Surface Occupancy during the months of September and October, and during the spring migration in May and June.	Depending upon the location of oil development infrastructure, movement of caribou between calving grounds, insect relief habitat and summer range could be disrupted by oil development. The level of effect would depend upon the location and level of development. An aboveground pipeline with no associated road would have little effect on movement, including spring and fall migrations. It is anticipated that caribou could migrate through or around the proposed oil field with relative ease. The Preferred Alternative in the Proposed RMP/Final EIS for fluid mineral leasing (Map 2-8) designates the Squirrel River as open with special stipulations. Special stipulations include such things as seasonal restrictions. In the unlikely event that BLM issues fluid mineral leases in this area, measures to avoid disturbance to caribou migration could be included in development plans.
197-9	Pg. 2-53. Any exploratory coal mining and development must protect and avoid the WACH calving and insect relief areas, as well as migratory routes.	Coal exploration may occur subject to the ROPs (Appendix A). Before an exploration license may be issued, the BLM authorized officer must prepare an environmental assessment, or EIS if necessary, of the potential effects of the proposed exploration on the natural and socio-economic environment of the affected area. Coal leasing and development is deferred (Chapter II.B.2.c)(1)(b)3. See response to comment # 65-70.

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197-17	Pgs. 2-104 to 2-108. Maniilaq supports Alternative C of the [Special Designations section]. Protection of the critical habitat for the WACH is of utmost importance and must include key migratory routes in the spring, summer and fall. Caribou wintering range protection must extend to all of the Nulato Hills ACEC and not just the northern section. WACH is wintering further south and west in recent winters. Any activity plan developed for these areas must include participation of the WACH Working Group and others.	The WACH winter range varies over time. Based on available data, the northern Nulato Hills are used more than the southern Nulato Hills. The Northern area is currently withdrawn from mineral leasing. Under Alternative C, the existing withdrawal would be maintained. The withdrawal would not be maintained under the Proposed RMP. Potential for oil and gas in the Nulato Hills is very low and development is highly unlikely. BLM activity plans are open to public participation and we would welcome input from the Working Group and others.
197-22	Any fire management must place priority (besides property and human life) on the wintering ranges of the WACH. Lichen is a very important winter food source for caribou. Past research has shown that caribou avoid for years, areas that had wildfires. Therefore, wildfire suppression regimes must include this important winter feed areas.	The Proposed RMP recognizes the importance of lichen habitat for caribou (Chapter III.B.6.) and proposes that site-specific fuels management actions needed to meet desired future conditions, habitat needs, or protection objectives will be made through activity-level plans including: Modeling the impact of fire on habitat of the WACH to determine appropriate management strategies; Developing an activity plan for management of WACH insect relief and core wintering habitat. Through this planning process, additional oil and gas leasing stipulations for insect relief habitat, appropriate mitigation measures for linear ROW, and fire management prescriptions for caribou winter range would be developed (Chapter II.B.1c).
240-1	Intrusive invasions by vehicles of any kind can disrupt the breeding and migration instincts [of caribou].	Chapter IV.B.3.b) of the Proposed RMP/Final EIS discusses impacts to wildlife from motorized vehicles. The ROPs in Appendix A contain seasonal restrictions aimed at reducing stress on caribou during critical periods.

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<b>WILDLIFE (INCLUDING SPECIAL STATUS SPECIES)</b>		
15-1	The Kobuk-Seward Peninsula Planning Area encompasses a small portion of the North Slope breeding habitat of the Steller's ( <i>Polysticta stelleri</i> ) and spectacled eiders ( <i>Somateria fischeri</i> ) both of which are listed as threatened under the Endangered Species Act of 1973, as amended (Act). In addition, both species migrate through the area when moving between wintering grounds in the southern Bering Sea and their North Slope breeding grounds. The Planning Area is adjacent to two marine areas designated as critical habitat for spectacled eiders (Ledyard Bay and Eastern Norton Sound). Although these areas are not under the jurisdiction of BLM, their presence should be noted so that potential impacts from activities permitted within the Planning Area can be assessed.	Both areas of marine critical habitat are mentioned in Chapter III.B.8.c). Designated critical habitat for spectacled eiders has been added to Map 3-15. No impacts to these habitats are anticipated from activities on BLM land within the Planning Area.
15-4	Kittlitz's murrelet ( <i>Brachyramphus brevirostris</i> ) a candidate species, is also thought to breed within the Planning Area. Under Section 7 of the Act candidate species are not assessed as part of the formal consultation or described in the biological assessment. Although not a requirement, BLM may choose to request a conference on the proposed action for this species. We encourage BLM to develop mechanisms to avoid or minimize adverse effects to Kittlitz's murrelets in the Planning Area.	BLM may choose to request a conference on Kittlitz's murrelet. However given the extremely limited information available on murrelet distribution and use of habitat within the Planning Area, the value of requesting a conference at this time is questionable. In addition, nothing in the Proposed RMP/Final EIS prohibits BLM from developing measures to minimize adverse effects on murrelets as more information on their distribution, population status, and habitat needs becomes available.

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15-14	The Final RMP/EIS should evaluate potential impacts to polar bears and walrus, and to subsistence uses, particularly of walrus. We recommend that the BLM work with the Service's Marine Mammals Management Office to identify important terrestrial habitats for these two species within the Planning Area, to fill gaps in our understanding of how they use the Planning Area and adjacent habitats, to evaluate potential impacts of RMP/EIS-authorized activities including coastal facilities and associated increases in marine boat and barge traffic, and to craft mitigation measures to reduce the potential for adverse effects.	Thank you for your comment. We contacted the Marine Mammal Protection Office regarding important terrestrial habitats within the planning area. Walrus haul out on Cape Lisburne and Cape Thompson within the Maritime National Wildlife Refuge. Polar bears use coastal habitats between Icy Cape and Cape Lisburne. Additional language has been added both Chapter III.B.8.c) and Chapter IV.B.4.c) regarding polar bears.
15-15	We also encourage the BLM to notify potential lease holders that projects potentially impacting polar bears and/or walrus will require consultation with our Marine Mammals Management Office and may require Interaction Plans and Letters of Authorization for the incidental take of these species.	BLM will notify potential lease holders that projects potentially impacting polar bears and/or walrus will require consultation with the Service's Marine Mammals Management Office and may require Interaction Plans and Letters of Authorization for the incidental take of these species. General language addressing this issue has been added to Appendix A.
24-1	There's BLM tracts that are currently not being managed by BLM for hunting or fishing, they are being managed by the State of Alaska. And so in light of that, ...where some of these BLM tracts may occur it may be preferable to enhance protections or not prefer ... Alternative B which lays the ground work for mineral exploration and enhanced resource use.	Hunting and fishing on all BLM land is managed by ADF&G unless it is closed to non-qualified subsistence users by the Federal Subsistence Board. State and Native-selected lands are not considered Federal public land under ANILCA and hunting and fishing on these lands is managed by ADF&G. These selected lands are also segregated from the land laws and are therefore closed to mineral entry and development until the selections are relinquished or the land is conveyed. In this case, the new land owner is responsible for minerals management.
24-15	All of the terrestrial species listed experience dramatic fluctuations in abundance and I urge BLM to enact effective inventory and monitoring of fish and wildlife populations.	ADF&G is responsible for management of wildlife. BLM assists ADF&G in monitoring and inventory of some species, particularly those important for subsistence. The USFWS has some responsibility for monitoring of listed species and migratory birds. The Proposed RMP/Final EIS allows for this cooperative work to continue.

Letter # - Comment #	Comment	Response
24-24	BLM should conduct annual assessments for all terrestrial wildlife as there are no sufficient annual assessments for any terrestrial species in GMU 22.	Neither ADF&G or BLM has the funding or staff to assess all terrestrial species on an annual basis, nor is it necessary. In many species, population assessments every 3-5 years are sufficient to provide a population trend.
24-25	Sheep should be considered for reintroduction into the Kigluiak and Bendeleben Mountains. There is historic evidence that sheep inhabited the Kigluaik Mountains. A habitat assessment should be undertaken for their reintroduction that would supplement any that were done by the State of Alaska.	ADF&G is responsible for management of wildlife. Under the Master Memorandum of Understanding Between ADF&G and BLM, BLM agreed to not sanction introduction or transplant of any wildlife species on or affecting Bureau lands without first consulting with the State. Since ADF&G has not indicated any desire to reintroduce sheep or marmot on BLM-managed lands within the planning area and no consultation has taken place regarding reintroduction of these species, it would not be appropriate for BLM to include it in the RMP at this time. If a reintroduction is considered in the future, BLM policy requires that a site-specific activity plan be developed with public input prior to any reintroduction, and that such reintroduction be considered in the land use plan.
24-28	Marmot should be considered for reintroduction into the Kigluiak and Bendeleben Mountains. Alaska Native legends and historic accounts of large squirrels substantiate their presence in the Seward Peninsula. A habitat assessment should be undertaken for their reintroduction that would supplement any that were done by the State of Alaska.	Thank you for your comment. See response to comment # 24-25.

Letter # - Comment #	Comment	Response
25-6	<p>In most cases, a 300 ft. setback from bankfull stage on major rivers would not adequately protect the tall shrub habitats that are critical to maintaining moose populations in western and northwestern Alaska. On the Seward Peninsula, riparian zones are very limited and often only occur in narrow zones that provide essential winter habitat for moose. A wider setback should be required to protect the full extent of riparian habitat. Loss of riparian habitat, as related to moose, should not be tolerated because many areas of Unit 22 and 23 are experiencing population declines and every effort should be made to protect tall shrub habitats to enable natural recovery of moose populations. Also, many other species are dependant on riparian habitats/corridors which are of limited distribution in Unit 22. Protecting tall shrub habitats helps maintain critical species diversity in these areas.</p>	<p>The Proposed RMP/Final EIS includes many protections for riparian habitat. The ROPs in Appendix A provide additional protection to riparian habitat - see response to comments # 65-54, # 24-2, and # 78-10. Oil and gas leasing stipulation #2 prohibits permanent facilities within 500 feet of either side of fish-bearing rivers. Management decisions in Chapter II section B(1)(c) "Fish and Wildlife" identify riparian and tall shrub habitats as high value wildlife habitat and recommend protection through avoidance and rehabilitation.</p>
25-8	<p>I prefer Alternative C, but recommend increasing the 300-foot setback as described for [solid leasables and locatable minerals] ( pg. 2-42). The re-established Seward Peninsula muskoxen population is expanding eastward, and the Nulato Hills will provide important winter habitat that will ensure the recovery and restoration of the population reaches its full extent on the Seward Peninsula. The areas identified are valuable to several species of wildlife found in Unit 22 including moose, muskoxen, caribou, and migratory waterfowl.</p>	<p>Thank you for your comment. See response to comment # 25-6.</p>

Letter # - Comment #	Comment	Response
25-11	This area [Kigluaik Mountains SRMA] is crucial brown bear and moose habitat and serves as a relatively inaccessible refuge for numerous Unit 22C wildlife populations. All 4 wheeler/pickup truck access should be prohibited from the area. Due to the close proximity of the area to Nome such allowed access would have adverse affects on the areas game populations.	In the Proposed RMP/Final EIS, Chapter II, section B.2.d) this area is identified as a Special Recreation Management Area. It will have a limited OHV designation. We plan on developing an Off-Highway Vehicle plan for this area that would involve diverse user groups. We appreciate your position and look forward to working with you in the future to develop appropriate limitations on OHV use in this area.
26-5	[L]arge blocks of land create refugia for animals, fish and wildlife that benefit subsistence. And I hope you look at it at a large block perspective and make some decisions about a larger patchwork rather than a small patchwork. Large patchworks are much more effective with fish and wildlife.	The Proposed RMP/Final EIS focuses management decisions such as ACEC designation and activity level planning on large blocks of BLM land. The plan allows for land exchange to consolidate land ownership in the future if deemed appropriate.
52-60	Pg. 4-212 (2) Wildlife, last paragraph, 1st sentence: The statement that mineral development would have the greatest impact on wildlife is not correct. Mineral development will affect only a few specific locations and, as with Red Dog, will have effectively NO impact on wildlife. To say otherwise flies in the face of the plain facts of nearly 20 years of experience at Red Dog. Hunting and subsistence harvest will have the greatest impacts, both positive and negative depending on management and this should be stated.	The language in Chapter IV.G.2.c)(2) has been revised.
58-17	pg 2-10 preventing wildland fire that is detrimental to caribou winter range: The comments on pg 2-8 (above) show the importance of old-growth lichen to caribou. The Working Group requests that the use of wildland fire techniques to improve moose habitat be separated from areas where fire would be detrimental to caribou.	Chapter II, section B.1.c)(3) "Management Common to All Action Alternatives" recommends use of fire to improve moose habitat only if it will not be detrimental to caribou winter range. Also, prescribed burning would require an in-depth analysis of the beneficial and detrimental effects on the habitat before such a project would be authorized.

Letter # - Comment #	Comment	Response
64-23	Pages 2-104 to 2-107, Alternative D: We recommend BLM develop stipulations to protect important resources for the Kuzitrin River and McCarthy Marsh in Alternative D. These areas provide critical moose habitat for moose populations important to many Seward Peninsula residents.	The ROPs in Appendix A of the Proposed RMP/Final EIS apply to all permitted activities on BLM-managed land within the Planning Area. About 70% of McCarthy's Marsh was recently conveyed to the State.
64-25	We also recommend the Bureau develop stipulations to protect important resources for the Kigluaik area in Alternative D. The area receives low access by motorized vehicles during snow free months and is an important bear denning area and rutting area for moose in the fall. There is also significant vegetation that is fragile and sensitive to disturbance in the area.	The Kigluaik Mountains will be designated as a Special Recreation Management Area and managed as outlined in Chapter II, section B(2)(d), "Recreation Management." A limited OHV designation will apply. Additional management direction may be developed through a Recreation Area Management Plan.
65-35	Residents of the planning area noted in scoping comments that the moose harvest level is not currently adequate: Moose populations are declining throughout the Seward Peninsula and it is becoming more difficult to obtain moose for subsistence. KSP RMP Scoping Report pg 11.	BLM is aware that moose populations are currently low in parts of the Seward Peninsula. Thus far, habitat quality has not been determined to be a cause of the current population declines. If habitat quality is declining, it is more likely due to overbrowsing or climate change than to activities authorized by BLM.
65-53	The quality of moose habitat plays an important role in dictating the distribution and availability of moose in a given area. It is important that BLM consider allocating protection to riparian zones and tall shrub habitats.	The Proposed RMP/Final EIS considers protection of riparian zones and tall shrubs. Many of the ROPs relate to riparian habitat protection (Appendix A). See also response to comment # 65-35.



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65-54	On the Seward Peninsula, riparian zones are very limited and often only occur in narrow zones that provide optimal winter habitat for moose... prime riparian habitat for moose is at risk if development takes place near riverbanks. Although the draft plan excludes prospective industrial activity from occurring within 300 feet of bank-full stage on major rivers, this may not adequately protect tall shrub habitats that are critical to maintain moose populations that are already in jeopardy.	Many of the ROPs in Appendix A (such as: ROP veg-2b, veg-2c, veg-2g, water-3d, water-3f, water-4b, water-5a, water-5b, water-5d, FW-7a) are designed to protect riparian habitat from disturbance. See also responses to comments # 65-35 and 65-53.
65-57	Of particular concern is wildlife habitat on the Agiapuk River...which supports the healthiest moose population on the Seward Peninsula, producing consistently high calf to cow and bull to cow ratios. BLM [should] adopt a watershed-based approach to the Agiapuk River's critical moose habitat management, and expand mineral development restrictions beyond the proposed 300 foot setback in order to protect areas where riparian habitat extends beyond that distance.	Thank you for your comment. See response to comment # 65-54
65-58	The approval of seismic activity and hard rock and fluid mineral entry in muskoxen habitat as proposed in Alternative D might conflict with recommendations from the Seward Peninsula Muskox Cooperators Group... which include: protecting and maintaining habitats that muskoxen depend on and allowing for continued growth and range expansion into historic habitats.	The RMP/EIS has taken a hard look at the impacts of the various activities that may take place during the life of the plan. BLM believes that the process it has followed is appropriate, legal and sufficient. BLM gathered important local and scientific knowledge and constructive public comment, and used this information to form a Preferred Alternative which balances competing resource values and interests in a responsible manner. The plan implements a number of Required Operating Procedures and oil and gas Stipulations to mitigate impacts identified in the plan. Coal leasing has been deferred - see response to comment # 65-70. The ROPs in Appendix A also apply to any surface disturbing activities, including mining. Before surface disturbing activities are approved, the BLM authorized officer must prepare and environmental assessment or EIS, if necessary, of the potential effects of the proposed exploration on the natural and socio-economic environment of the affected area.

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65-59	ADF&G's goal of developing a wolf management plan with public input for Unit 26A...might be jeopardized if industrial exploration and production activities are approved in this area under Alternative D, especially if subsequent WACH displacement occurs.	Thank you for your comment. See response to comment #65-58.
65-60	Under Alternative D, mineral development could affect prey populations that form the supplemental diet of the brown bear, thereby catalyzing declines in brown bear populations. This may be compounded with a decline in local fish stocks: Draft RMP/EIS at 3-60. Winter exploration can also disturb brown bears in their maternity dens.	Under the Preferred Alternative (D), minimal area will be disturbed, and the ROPs and Stipulations in Appendix A, and land allocations are intended to protect natural resources. We do not anticipate significant impacts to prey populations due to activities authorized by BLM.
65-61	BLM should work with ADF&G to establish baseline data and monitor lynx populations closely if development is permitted to occur in areas that may adversely impact its habitat or populations of snowshoe hare, the lynx's primary food source.	ADF&G is responsible for monitoring wildlife populations. BLM will work with the State and other Federal agencies in development of recovery plans, management plans, conservation strategies, or assessments of special status species as needed.
65-62	The draft plan states that alteration of habitat, seasonal "ground level activity" and high noise levels should be prohibited within 650 feet of [eider] nest sites. Draft RMP/EIS at 3-86. BLM does not explain how the distance was determined and nothing specific is outlined in either Alternative to address this proposal.	As stated in the RMP/EIS in Chapter III, section B(7)(c)(1)(b), "Spectacled Eider," these recommendations come from the Spectacled Eider Recovery Plan (FWS 1996). These recommendations are included under ROP SS-1b in Appendix A. The ROPs apply to Alternatives B, C, and D.

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65-63	Though BLM cites intentions to consult with the USFWS under Section 7 of ESA to mitigate and minimize adverse impacts to eider populations, this claim is contrary to earlier statements that convey the BLM has not conducted any census of breeding pairs in the planning area prior to proposing development.	BLM is currently consulting with the FWS on the Proposed RMP/Final EIS. Any terms and conditions resulting from this consultation will be incorporated into the Record of Decision and Final RMP. BLM has not proposed any specific development in the RMP. The RMP makes land available if there is interest from industry. When and if BLM receives an application for some type of activity and determines that the proposed activity "may affect" a listed species, we will initiate Section 7 Consultation on the proposed activity. Any terms and conditions resulting from this project level consultation will be included as stipulations in the permit authorizing the activity. FWS conducts annual eider surveys on the North Slope which encompass eider habitat within the Planning Area.
65-64	Kittlitz's Murrelet: The BLM's conclusion that the lack of sightings indicates that the Kittlitzs Murrelet "probably" winters at sea is not based on sound science and its dismissal of nest inventories due to cost effectiveness is irresponsible.	This conclusion is based on data summarized by Day et al. (1999). Very few nests have ever been found even in areas with much higher population densities than the Planning Area. Day et al. lists 25 known nest sites total, four of which were in Russia. Currently there is not a well designed census technique for breeding murrelets and areas of higher population densities such as Prince William Sound are higher priority for monitoring than the Planning Area. Nothing in the RMP prohibits BLM from conducting nest surveys should a good methodology be developed and funding be available. One management action identified in Chapter II.B.1.d) is to "Identify specific areas and habitats of importance to Special Status Species, including, but not limited to: spectacled eider, Kittlitz's murrelet, yellow-billed loon, and shorebirds." Additional language has been added to Chapter III.B.8.c)(2) to clarify.
65-65	Kittlitz's Murrelet: The Bureau should adopt cautionary measures to protect potentially threatened species rather than acting after listing [Under the ESA] occurs.	ROP SS-1a, ROP SS-1c, ROP SS-1d, and ROP SS-1e in Appendix A of the Proposed RMP/Final EIS outline measures that BLM will adopt to protect sensitive and candidate species. Also see response to comment # 15-4.
65-66	Should the USFWS declare the Kittlitz's Murrelet a threatened or endangered species, the BLM would be obligated by law to contract with the Service to inventory nest sites and more costs may be incurred than if preemptive measures are undertaken.	If the Kittlitz's murrelet is listed as threatened or endangered, BLM will consult with the USFWS as required under Section 7 of the Endangered Species Act. Any additional appropriate protective measures (terms and conditions) needed to further protect murrelets will be developed during consultation.

Letter # - Comment #	Comment	Response
197-3	Three hundred foot setbacks on streams does not adequately provide protection for critical moose habitat.	Thank you for your comment. See response to comment # 25-6.
197-24	Some drainage[s have] been completely over hunted by sports hunters and [have] virtually no moose. [In] areas where moose have been over hunted, recovery is very slow and hunting restrictions have been adopted to protect the population.	ADF&G manages wildlife populations and hunting. Also see response to comments # 65-35 and # 65-53 regarding moose.
197-4	While [Dall] sheep habitate in higher elevations and remote areas, they are very susceptible to harassment and are easily displaced. Any development activity must be controlled so that any activity that may affect them in their habitat is minimized.	There is very limited Dall sheep habitat on BLM-managed land in the Planning Area. If BLM receives proposals for activities in Dall sheep habitat, potential impacts to sheep would be analyzed under NEPA and mitigated to the extent possible.
198-8	BLM has failed to fully analyze the impacts on fish, waterfowl, moose and other wildlife in the EIS and has failed to develop an alternative that protects subsistence. Table 2-1 "Fish and Wildlife - Summary of Alternatives" (at 2-12) is an example of BLM's failure. As demonstrated by the summary, none of the alternatives specifically address any fish or wildlife concerns except for those related to caribou.	The Proposed RMP/Final EIS addresses both fish and wildlife. Table 2-1 is a summary of differences between alternatives for fish and wildlife management. Additional management action for fish and wildlife is outlined in Chapter II, section B(1)(c), "Fish and Wildlife," and section B(1)(d), "Special Status Species." The ROPs in Appendix A provide additional protection for wildlife and fish habitat, as well as subsistence use. Additional management actions beneficial to fish and wildlife are proposed under other programs, such as Special Designations or Recreation Management. Proposed management direction for subsistence is under Chapter II, section B(5), "Subsistence." Impacts on fish, wildlife and subsistence are analyzed in Chapter IV, section B(3), "Fish and Wildlife," section B(4), "Special Status Species," and section F, "Subsistence." Cumulative impacts are analyzed under Chapter IV, section G, "Cumulative Impacts."
417-1	The relative impact of the potential oil and gas in this area to U. S. energy supplies does not compare in importance to the significance of maintaining these lands for wildlife and native culture.	Thank you for your comment. See response to comment #65-58.

Letter # - Comment #	Comment	Response
<b>FIRE MANAGEMENT AND ECOLOGY</b>		
1-2	No prescribed burning should be allowed to provide lichen for caribou. Your burning causes far more delterious effects than the caribou eating the lichen	Prescribed fires would rarely if ever be conducted in areas where they would impact important caribou habitat. Prescribed fires would more likely be implemented to reduce a hazard fuel situation or improve habitat for species other than caribou. Note that under "Management Common to All Alternatives" in Chapter II.B(1)(b)(3)(b) that the first two bullets address the unique lichen-rich plant community habitat and managing action in support of those habitats. A prescribed burn would require an in-depth analysis of the beneficial and detrimental effects on that habitat before a decision that authorizes the project. The section noted above also provides for use of the appropriate fire management option designation to protect old growth lichen and for management for multi-age stands of lichen with the recognition that caribou prefer old growth.
58-20	pg 2-15&16 Alternative C – allow wildland fire use that is not detrimental to caribou lichen habitat: The Working Group supports Alternative C if wildland fire techniques are minimized in areas where fire would be detrimental to caribou through destruction of old-growth lichen.	Under both Alternatives C and D an activity-level plan will be written addressing wildfire and wildland fire use. The reason for writing the plan is to address management of old growth lichen habitat for caribou and other issues. The goals listed in Chapter II.B(1)(c)(1)(b) also reflect this thought. The intent is to work closely with ADF&G and the WACH Working Group to implement cooperative management efforts.
64-30	Page 2-129, Effects on Fire Management and Ecology: In the table under "Cumulative Effects," review and edit the second sentence to read "There are several areas in the Full and Critical Management Options that are adjacent to BLM-managed lands."	Thank you for your comment. This correction was made.

Letter # - Comment #	Comment	Response
<b>CULTURAL AND PALEONTOLOGICAL RESOURCES</b>		
23-1	We [Bering Straits Native Corporation] have a number of small tracts that are within these lands that we will receive conveyance of that are cemetery historic sites...mineral development may in fact impact the surrounding areas and the integrity of the sites as cemetery historic sites	Mineral development is managed by BLM under 43 CFR 3809 which mandates consideration of all cultural resources that may be affected by mining activities. Impacts from mining projects even outside of the direct area being mined are to be considered during this process while requirements of NEPA, FLPMA, and the NHPA also must be met. Native consultation would be done as required under these laws including for cemetery and historic sites. We would be glad to work further with you to ensure that information you have about any specific sites is considered.
56-26	Any pre-historic sites should become the property of the respective tribes. When cultural sites are found, the tribe should be consulted in a sufficient manner respective of EO 13175.	Archaeological sites are found on lands throughout the planning area. The status of these lands is a mix of State, Federal, and private (including Native allotments and Native corporation) ownership. EO 13175, with its overall charge to Federal agencies to consult and coordinate in the development of Federal policies that have tribal implications is carried out in the land management process through BLM's ongoing procedures required under NEPA and FLPMA. Under those laws, BLM routinely notifies, consults, and coordinates with Native Alaskans on proposed projects that may be of concern to them. Also, consultation is required under the National Historic Preservation Act for actions that may affect properties on or eligible to the National Register of Historic Place.
197-24	Pg. 2-19, Table 2-3: Manillaq supports and prefers Alternative C to "Avoid or mitigate impacts to significant cultural resources resulting in Bureau undertakings." All cultural resources must be protected and avoided to the greatest extent possible.	Site-specific designations direct fire managers to both protect these sites and to avoid any disturbance. Fire staff adhere to those directions provided they have been notified that the site exists and its location. Annual reviews and updates are required under the Fire Management Plan and interested parties may contact the local fire manager to confirm that their sites are correctly identified. When a fire does occur, fire staff make an effort to contact affected land owners. This also provides additional opportunities to notify the fire staff of site locations and appropriate actions.

Letter # - Comment #	Comment	Response
<b>VISUAL RESOURCE MANAGEMENT</b>		
52-19	Pg. 3-130. Table 3-15: VRM Class II designation of 28% of the Planning Area would adversely impact any development in the affected area. Specifically, it would hinder if not preclude the development of mineral resources. We would encourage BLM to remove all VRM II & III areas.	Table 3-15 makes reference to the initial visual inventory of the entire planning area. Table 2-4 shows the BLM's Preferred Alternative (D) with the following acreages: Class II (7%), Class III (41%) and Class IV (52%). Class III classification does not preclude development of mineral resources. The objective for Class III is to partially retain the existing character of the landscape. The changes made to the landscape should be moderate. The activities may attract attention but should not dominate the viewshed. (BLM manual H-8410-1).
<b>WILDERNESS</b>		
65-119	None of the alternatives specifically mention as an issue the identification of areas within the Kobuk-Seward Peninsula planning area that may warrant consideration for designation of Wilderness or Wilderness Study Area (WSA).	In Chapter I.D(2). Issues Considered but Not Further Analyzed, there is a section discussing the issue and the rationale for not including wilderness inventory and management in the RMP/EIS.
65-120	Criteria for areas to be considered for WSA designation are found in the Wilderness Inventory and Study Procedures Handbook...This inventory should be completed and should include a thorough wilderness review and inventory of the Kobuk-Seward Peninsula planning area and [be] forwarded to Congress. We strongly urge BLM to recognize wilderness as a resource category.	BLM appreciates your interest in considering wilderness for designation. Chapter I.D.2. "Issues Considered, but not Further Analyzed," gives BLM's rationale for not considering lands within the planning area for wilderness designation. BLM has addressed wilderness values such as opportunities for solitude and unconfined recreation within the planning area in Chapter III.B.13. "Wilderness Characteristics."
65-121	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.	Thank you for your comment. See response to comment # 65-120.

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65-122	It [Secretary Norton's decision] is not a citizen-based policy. It sets up restrictive conditions that are not required by ANILCA or the Wilderness Act. She [Norton] falsely claims that Alaska BLM lands have been exhaustively reviewed for wilderness when in fact there has never been such a review.	Thank you for your comment.
65-123	The draft KSP RMP/EIS for the must include a reasonable range of alternatives that include recommendations to Congress for new wilderness designations.	Thank you for your comment. See response to comment # 65-120.



## 2. RESOURCE USES

Letter # - Comment #	Comment	Response
<b>FOREST PRODUCTS</b>		
1-3	Ban all logging, which causes erosion, creates heat islands, causes death of wildlife and birds.	Within the planning area, forest lands cover only 8% of BLM-managed lands, or just under one million acres. BLM has not conducted an inventory of forest resources. However, with anticipated long rotation periods between potential timber harvests (approximately 100 years), low timber volume, low timber productivity, scattered timber stands, long distances involved in log transport, minimal transportation infrastructure, potential for adverse impacts, and low foreseeable demand, commercial logging operations within the planning area do not seem practical. It is doubtful that BLM would authorize commercial timber harvest within the planning area.
26-3	[I] also noted that you didn't have beetles, spruce beetle infestations at Council and I know that in 2002, they reached there. I took several calls.	Spruce bark beetle activity east of Nome and Council shown on Map 3-23 is based on aerial flights made by Alaska State and Federal forestry personnel in 1991, 1999, 2000, 2002, and 2004. The focus was mainly on forested areas around Elim, the Tubutulik River, and the Fish River. It appears their flight lines did not extend farther west to the Council area. However, the Forest Health Conditions in Alaska – 2004 report states that the bulk of light to moderate bark beetle activity“ occurs in the hills behind and around White Mountain; however, pockets extend upriver to at least Glacier Creek. Beyond that point, reliable observations were unable to be made due to "heavy smoke from wildfires" (Wittwer 2005). Glacier Creek is approximately 12 miles east of Council. Given the proximity of Council to documented areas of light to moderate bark beetle activity in the White Mountain/Fish River/Glacier Creek area, and the severe outbreak on nearby Elim Native Corporation lands, it is likely that the Council area has been affected by spruce bark beetles as well.
<b>LIVESTOCK GRAZING</b>		
1-4	Ban all grazing. Particularly cattle which cause horrendous environmental damage to the land, eat native plants beyond repair, etc. They pollute streams and water...Including rates of \$1.25 per acre per year to graze.	The Proposed RMP/Final EIS allows for continuation of reindeer grazing on the Seward Peninsula. No grazing by cattle would be permitted.

Letter # - Comment #	Comment	Response
25-5	I support Alternative D which would limit permitted livestock grazing to reindeer, and close the vacant areas in McCarthy's Marsh and the Kuzitrin River to grazing. Western Arctic caribou are usually present during the fall migration, winter and spring migration seasons, thereby causing conflicts with any expansion of grazing activities. These areas [Kuzitrin River and McCarthy Marsh] should remain closed to reindeer grazing as long as caribou continue to winter on the Seward Peninsula.	Thank you for your comment. See response to comment # 69-4.
58-3	Minimizing conflict between reindeer herders and the caribou herd is a goal of [The WACH Cooperative Management Plan]. The Working Group recommends reduced grazing activities within areas frequented by caribou to help avoid conflicts in the future.	Thank you for your comment. See response to comment # 69-4.
64-12	Pgs. 2-34 and 2-35: The State supports limiting livestock grazing permits to allow only reindeer and to close vacant areas in McCarthy's Marsh and the Kuzitrin River to livestock grazing. Western Arctic caribou are usually present in these areas during the fall migration, winter, and spring migration seasons, thereby causing conflicts with any expansion of grazing activities. We request these areas remain closed to reindeer grazing as long as caribou continue to winter on the Seward Peninsula.	Thank you for your comment. See response to comment # 69-4.

Letter # - Comment #	Comment	Response
69-1	<p>[H]istory shows that over 600,000 reindeer grazed the land from Barrow to Dillingham in the 1930s. If anything, the population of managed reindeer as compared to wild caribou is small and the concern for overgrazing by a group of animals should be directed at caribou.</p>	<p>The number of reindeer is very small (about 2%) compared to the number of wild caribou. The Western Arctic Caribou Herd (WACH) is definitely having an impact on their winter habitat as discussed in Chapter III.B.6.b). BLM has documented a clear decline in lichen cover in the Buckland River valley, Selawik Hills, northern Nulato Hills, McCarthy's Marsh, and Death Valley. In 1981, lichen cover on vegetation transects in Buckland River valley, Selawik Hills, and northern Nulato Hills averaged 35%. By 1996 it had decreased to 19%, and by 2005 to 13%. The first year of vegetation transects in McCarthy's Marsh and Death Valley (1997) showed 46% average lichen cover. By 2006, lichen cover showed a considerable drop to 21%. Fire contributed only slightly to this decline, as it affected only one of 33 vegetation transects from 1995-2005. Climatic warming, with its positive effects on shrub growth in Alaska, may be having a small negative effect on lichen growth as well. At this point we feel grazing by caribou is primarily responsible for the steady decline in lichen cover on portions of WACH winter range. ADF&amp;G data from the mid 1980's through the present have shown an expansion of caribou winter range, out of the Nulato Hills, west into the Seward Peninsula. The WACH also has become more dispersed in the last decade, not only expanding west, north, and east during the winter, but also forming smaller groups spread out over a larger area during winter months. Thus we may be seeing the WACH respond to less available lichen in portions of their winter range. Caribou and their associated forage plant species are expected to fluctuate naturally over the short term (5-10 years) and long term (50-100+ years). BLM's knowledge of the condition and trends in forage plant species will help shape response to wildland fire. Funds and personnel can be directed towards protection of lichen-rich winter range that otherwise would be kept under routine surveillance and left to burn. Knowledge of caribou habitat, when combined with other key factors such as calf recruitment, mortality rate, harvest levels, and weather conditions can help predict large declines in caribou population numbers, and help prepare for the effects on subsistence-dependent communities.</p>
69-3	<p>Reindeer herders have a long standing relationship with BLM and therefore Alternative A, in which the status quo is maintained would be the best alternative for herders. The reindeer herders understand the system for obtaining permits for use of public grazing land. They understand the requirements for obtaining permission for developing infrastructure or improvements to corrals. The use of ATVs and snowmachines is permitted.</p>	<p>Thank you for your comment, it was considered when crafting the final preferred alternative. BLM looks forward to continuing to work with the Reindeer Herders Association. The permitting process will not change.</p>

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69-4	We are opposed to Alternative C... and D... specifically permanently closing of permitted areas to reindeer herding...[we] suggest you maintain an open status for reindeer permits in McCarthy Marsh and Upper Kuzitrin River	The Proposed RMP/Final EIS closes McCarthy's Marsh and Upper Kuzitrin to grazing. These areas are important wildlife habitat that is frequently used by the WACH and have not been permitted for reindeer grazing since the 1980s.
<b>MINERALS</b>		
<b>MINERALS - GENERAL</b>		
14-16	In the face of uncertainty regarding potential impacts to these valuable [fish and wildlife] resources, avoiding surface disturbance in the most biologically sensitive areas, as presented in Alternative C, would provide the greatest level of protection (and least risk) to wildlife, and is our preferred management approach.	Alternative C provides the greatest level of protection under the Proposed RMP/Final EIS. However, in the interest of meeting BLM's mandate of managing for multiple use, BLM's Preferred Alternative is a melding of Resource Development (Alternative B) and Resource Protection (Alternative C).
14-21	For any activity requiring an Operating Plan, the plan must be completed and approved by BLM, in consultation with the Western Arctic Caribou Herd Working Group, before project activities commence.	BLM's final approval allowing on-the-ground actions to proceed requires site-specific planning and additional NEPA analysis. The WACH Working Group has opportunities to comment on proposed activities during NEPA analyses.
24-16	BLM cannot possibly substantiate the number of acres in its agency Preferred Alternative since the current level of activity does not come close to that proposed by BLM. BLM's proposed acreage for mineral development is outrageous and is not substantiated by any significant geological information.	The disturbed acreage projected by the Reasonably Foreseeable Development scenarios (RFD) are only an estimate and are designed to provide a baseline level of mineral activity for analysis of impacts under NEPA. The analysis represents best estimates of impacts since exact locations of development are often unknown. Impacts are quantified to the extent practical with available data. In the absence of quantitative data, best professional judgment provides the basis for the impact analysis. The separate technical documents, Mineral Occurrence Reports and Reasonably Foreseeable Development Reports prepared for Leasable and Locatable minerals, are the basis for these numbers, and are available from the State and Field offices, and on BLM's website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a>

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	43-2	I've lived here all my life and I've seen the effects of past mining companies up here. I've seen thousands of empty drums all up through the mountainside up here. Would BLM be up to cleaning up any of the barrels I am talking about? Would it have to be on BLM land? What I am talking about is all on native selected NANA lands.
52-5	We encourage BLM to continue its efforts to conduct modern geophysical, geochemical and water surveys along with geologic mapping and mineral and energy resource studies. Up-to-date information will be needed to properly implement the Final RMP/EIS. We especially encourage more detailed assessments of the larger blocks of BLM-managed land, especially those areas closed by ANCSA Section (d)(1).	Thank you for your comment; it has been noted.
53-1	[BLM should] provide for maximum access to mineral resources because the Kobuk-Seward DRMP/EIS area is highly potential for discovery of new ore deposits	The goal and objectives for locatable minerals in the Proposed RMP/ Final EIS is to maintain or enhance opportunities for mineral exploration and development while protecting other resource values. In fact, BLM encourages development by private industry of public land mineral resources, and promotes practices and technology that least impact natural and human resources.
54-3	Resource development, such as mining, will have a negative impact. Our current mining laws are very liberal, allowing the use of dangerous chemicals, and have almost no provision for any local or state benefit from such activities.	See response to comment #78-8

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58-51	BLM has an overall restoration goal of returning the disturbed land to its previous primary uses as fish and wildlife habitat and for subsistence uses by native villagers; however, it has yet to develop specific dismantling, restoration, and reclamation requirements to implement that goal. The Draft RMP/EIS should explicitly describe the dismantling and removal of infrastructure, as well as a specific reclamation plan for the area, including time lines and funding mechanisms.	Reclamation decisions are more appropriately addressed in an implementation level plan when a surface disturbing activity is proposed. This occurs subsequent to the adoption of the RMP/EIS. Before any fluid leasable mineral on-the-ground activity is approved by the BLM, the Application for Permit to Drill (APD) must include a 12-point Surface Use Plan of Operation in accordance with the requirements of BLM Onshore Order #1. A reclamation plan is included in the Surface Use Plan of Operations and discusses plans for both interim and final reclamation. Reclamation is required of any surface previously disturbed that is not necessary for continued production operations.
58-52	An explicit monitoring and assessment plan must be developed and thresholds must be identified for specific management actions. This will allow BLM to meet its overall goal of returning the land to a condition that will sustain its previous uses such as caribou habitat and subsistence activities.	We believe the plan meets these objectives. See also response to comment #58-51
63-1	I would like to see very little to no industrial or commercial development on BLM lands. In my experience, commercial/corporate interests benefit only the shareholders of the company involved, and in rural areas, typically involve some type of resource extraction, leaving a long term negative impact on the land, the wildlife, and the peoples of the area affected. For local residents, the long-term value of the land for subsistence use and recreation is far more valuable than the short-term financial benefits to a corporation based hundreds or thousands of miles away, with no real vested interest in the local community.	BLM does not make planning decisions based on mineral values (high or low) but on multiple use and sustained yield. The objective is to maintain or enhance opportunities for mineral exploration and development while protecting other resource values. Responsible mineral development is carried out through the implementation and enforcement of ROPs and Stips (Appendix A) as well as through other appropriate laws and regulations already in place. Recreation does have a priority in this plan as there are several large blocks of land in the Preferred Alternative with a recreation emphasis (Squirrel River and Salmon Lake-Kigluaik special recreation management areas, Iditarod National Historic Trail). Regarding subsistence, ANILCA mandates that the BLM consider the effects of proposed management on subsistence resources.

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64-60	Concerns have also been expressed regarding the proposed 300-foot setback from Boston Creek due to the fact that this area contains abundant polymetallic veining and is host to numerous gold placer deposits surrounding the area. In addition, the 300-foot setback on the upper Kivalina River may negatively impact the resource value of State lands to the north and lands selected to the south. We request that BLM consider alternative means of managing the resources of this area as well.	The 300-foot locatable mineral withdrawal and NSO on Boston Creek was not carried forward into the Proposed RMP/Final EIS because the lower reaches of this watershed were conveyed to the State of Alaska in 2006. Oil and Gas Leasing Stipulation 2 which prohibits permanent oil and gas facilities within 500 feet of fish-bearing water bodies would apply to the upper watershed which remains under BLM management. An exception to this Stipulation may be approved on a case-by-case basis. The Kivalina River will not be withdrawn from mineral entry. However, strict standards for riparian and fisheries habitat protection will apply as discussed under ROP FW-7a will apply (Appendix A). In addition, Oil and Gas Leasing Stipulation 2 will also apply to the Kivalina River.
78-8	Extractive development will cause habitat destruction and disruption of local ecosystems through noise, pollution potential, and infrastructure and transportation corridors associated with development projects. Removal of these areas from available harvesting places and restricted access to a larger surrounding the development project is also of great concern as examples from the North Slope have shown. Also, there should be no development allowed in identified caribou critical habitat.	BLM has a multiple-use mandate which includes responsible mineral development carried out through the implementation and enforcement of ROPs and Stips (Appendix A) as well as through other appropriate laws and regulations already in place. An Interdisciplinary team of BLM resource specialists provided input to create the ROPs and Stips which mitigate impacts to other resources within the planning area.
117-4	Toxic chemicals used in mining should be banned in the management plan. A large scale mine of any sort would forever scar the environment as the lands in the arctic or sub-arctic recover very slowly from massive excavation.	Decisions to be made on the types of chemicals used for proposed mining operations are more appropriately addressed in an implementation plan. This occurs after the adoption of the RMP/EIS. Land use planning decisions consist of desired outcomes (goals, standards, and objectives) and the allowable uses (including allocations, levels of use, and restrictions on use) and management actions necessary to achieve those outcomes. Implementation decisions generally constitute BLM's final approval allowing on-the-ground actions to proceed. These types of decisions require site specific planning and additional NEPA analysis.

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	396-1	I am very concerned about the use of chemicals in hard rock mining and do not want to see the irresponsible mining practices that threaten our area. [particularly] about the area around the Wild Goose Pipeline, Mt. Osborne and other scenic and subsistence related areas on the Seward Peninsula.
<b>LOCATABLE AND SALABLE MINERALS</b>		
24-8	BLM generally exaggerates the presence and availability of locatable minerals. It appears that the points on the RMP/EIS map of locatable mineral resources are merely every USGS RDF location and are so minor to preclude development other than panning for recreation. BLM should require a separate assessment of the locatable minerals since much of the assessments were done by exploration geologists that were or are connected very strongly to the mining community and comprise very brief information.	We disagree. The BLM geologists that work in this program have degrees in Geology and Mining Engineering from accredited Universities and the methodology they use to assess mineral potential have been developed by academic, industry and government entities over many years and are modified to reflect advances in geologic knowledge, understanding of mineral occurrences and advances in information technology. It is unfortunate that there is not sufficient funding or time to conduct any new field reconnaissance of these documented mineral occurrences. The ARDF (Alaska Resource Data File) locations, originally generated by the US Geological Survey were merged with the mineral occurrence data generated by the US Bureau of Mines mineral occurrence listings in order to compile a consolidated listing. No documented mineral occurrences were excluded without reason and regardless of how old the information is. Map 3-29 identifies known locations from AMIS and industry locations. These have not been sorted for previous production or level of potential production. The description of potential areas within the section describes historic and current activity. Mineral Occurrence Reports and Reasonably Foreseeable Development Scenarios are technical reports that were prepared in support of this planning effort, and are available from the State or Field office or on the BLM website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a> . A separate assessment or inventory such as you recommend is beyond available funding.



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24-17	BLM did not adequately characterize the locatable minerals as many of these locations are very minor historical locations where trace amounts of gold may have been found.	Short of conducting a multi-year Mining District Mineral Assessment (Scheduled in the future subject to continued funding of the minerals program) this information represents the best available data from the publicly available geological literature. Funding for this program originally instituted by Congress in compliance with ANILCA section 1010 is in jeopardy for fiscal year 2007 and non-existent for fiscal year 2008. The commenter is correct in that the locations have not been mined or explored recently, and may have minimal potential. This is reflected in the Reasonably Foreseeable Mineral Development scenarios for this Plan, which anticipate only minor development on Federal land as shown in this document and supporting technical reports. Some areas have been closed to modern exploration and development, making any characterization difficult.
52-27	Pg. 3-164. Figure 3-3: What units are used for labor costs? This Figure is not well formatted in several ways, need to list years.	Figure 3-3 was reformatted. Unit labels (\$/hr.) were added to the legend and years were added to the x axis.
52-28	Pg. 3-165. Figure 3-4: A separate scale with units is needed for labor and equipment costs to make the data more comprehensible. Are the costs shown in \$/hour? This Figure is not well formatted.	Figure 3-4 was reformatted. The following text was added below the figure. "In the chart above, labor and equipment costs are plotted in actual dollars per hour and commodities in dollars per troy ounce. While these do not equate, it is the slope and inflections of the curves that are instructive"
52-29	Pg. 3-166. 1st full paragraph: "... mining notices and plans of operations from 1982 through the 2004 season." Figure 3-6 shows land disturbance from 1989-2004. Should 1982 be 1989 in this sentence?	Thank you for your comment. This correction has been made.

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52-30	<p>Pg. 3-165. Figures 3-5 and 3-6: What is the purpose of these figures, and of this entire section? What is the significance or reason for this discussion of the high locatable mineral potential (HLMP) areas? The amount of land disturbed is a very small fraction of the total planning area. What is the total area of surface disturbance versus the total area? The total, excluding Red Dog Mine appears to be about 1000 acres based upon Table 3-17. This is a miniscule area. Also, are these disturbances all inclusive or only those associated with APMA data for the period 1982-2004? What is the basis or source of this information? The entire section appears to have a bias against any disturbance, even though Alaska has very stringent reclamation requirements.</p>	<p>Figure 3-5 plots the cumulative surface disturbance by mining operations for the 1989 through 2004 mining seasons by land owner. While the total amount of surface disturbance due to active mining is minimal (2,868 acres over 17 years) compared to the size of the planning area it is instructive to look at surface disturbance by land ownership in each of the identified High Locatable Mineral Potential Areas (HLMP). The chart shows that three-quarters of the active mining operations within the planning area boundary occurred on private lands and only 6% on Federally-managed lands which, while certainly in part due to increasing restrictions on Federal mining claims, reflects the distribution of patented mining claims and the success of the State and Native Corporations in selecting mineral lands. Figure 3-6 shows the distribution and level of mining activity (surface disturbance) in each of the HLMP areas by land ownership. The 3 highest levels of mining occur on private lands in the Red Dog HLMP, the Nome West HLMP and the Kougarok HLMP areas. The 3 highest levels of mining activity (surface disturbance) on State-managed lands occur in the Nome West HLMP, the Eastern Seward Peninsula HLMP and the Kougarok HLMP areas. On Federally-managed lands (including inholdings) the highest levels of mining occur in the Red Dog HLMP, the Nome West HLMP and the Teller HLMP areas. Figure 3-5 illustrates the limited mining on Federal Land based on APMA filings from 1982 through 2004 mining seasons. Figure 3-6 supports this by showing that of 12 HLMP areas, projected Federal surface disturbance is a minor acreage in five of the areas. It is not the purpose of this section to inform the reader that the acreage shown on Table 3-17 is from about 31 million acres, or that this document projects a maximum disturbance on Federal land to be less than 70 acres out of the millions of acres to be managed. Rather, it suggests that the Federal land will not be a significant resource as the area develops its mineral potential, using surface disturbance as a proxy for magnitude of impact from current and future development.</p>
52-31	<p>Pg. 3-167: If there is a purpose for this discussion/focus, a map showing the locations of the HLMP areas listed on Figure 3-6 should be referenced.</p>	<p>Reference Figure 6a in the Mineral Occurrence and Development Potential Report for Locatable and Salable Minerals KSP/RMP, which is available on the BLM website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a></p>

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52-34	Pg. 3-180. Mining Activity Highlights: Much of the exploration activity is not listed in this section. The most glaring is that the Big Hurrah and Rock Creek deposits received significant attention and drilling over the past several years and are scheduled to go into production in 2007 (NovaGold Resources Inc.). At least three different companies have drilled over the past 15 years at Rock Creek.	Mining Activity Highlights were taken from the Exploration and Production sections of the State Geological Survey's annual report on Alaska's Mineral Industry current through the 2004 mining season (time of writing of this report). It is noted in Chapter III, section C(3)(b)(5)(b)(2)(b), "Mining Activity Highlights" that at the time of writing Nova Gold's Rock Creek/Big Hurrah Properties were then scheduled to go into production in 2006. Nova Gold has announced several production dates in the recent past, but to date production has been put back. Both the Rock Creek and the Big Hurrah Properties are located on private patented claims (core claims) and surrounded by State and Native lands.
52-35	Pg. 3-181. Nome West HLMP: In addition to Nova Natural Resources Corp, NovaGold, Altar Resources should both be listed.	We did not list Altar Resources because they are not listed in the Alaska Mineral Industry Report as a principal player in the economic development of the area.
52-36	Pg. 3-182-183: Nova Gold should be identified as NovaGold Resources Inc. A global search and replace on this name is needed.	Thank you for your comment. This correction has been made.
52-37	Pg. 3-186: No mention is made to the fact that Alaska Gold was purchased by NovaGold Resources. Also, activity in 2004 and 2005 is not included.	The 2005 activities are not considered here as this information was not available at the time of writing of the Draft RMP/EIS. Alaska's Mineral Industry Reports generally come out in summary during the spring of the following year and the final report is published in full the fall of the following year in time for the Annual Miners Convention. Consequently the most recent information from this report available at the time of writing of the Draft RMP/EIS was the 2004 Final Report .
52-38	Pg. 3-192: None of the drilling and other activity from 2003 to 2005 at Arctic by NovaGold is mentioned. This is an area of major significance in that it may be the highest grade and largest Cu deposit in the area. Also, no mention is made of the massive cleanup job that NovaGold did in the area.	The drilling section of the Alaska's Mineral Industry Reports generalizes drilling footage by region for confidentiality reasons and does not specifically report footage drilled by company or property. Similarly for information published in the exploration and production sections of AMI Reports. The planning area encompasses the Western Region and the western part of the Northern Region. Therefore it is generally not possible to quantify drilling footage by specific property.
52-39	Pg. 3-193. mid page incomplete sentence: "These placer gold occurrences are generally restricted to? the schist bedrock.	Thank you for your comment. This correction has been made.

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52-41	Pg. 3-196. last sentence, 1st paragraph beginning "Marginal ...." This comment is not a true and is totally inappropriate. Red Dog is not a marginal project. Hedging is done for a number of reasons but the comment has no relevance here.	This section was reworded to clarify. Particularly for operations beginning production, high up front capital costs can be hedged by future commodity prices. Incrementally increasing the initial mill production capacity, along with market increases in commodity prices is another strategy which expands reserves and encourages the post-startup development of recently discovered satellite deposits.
52-42	Pg. 3-196. Mining Activity Highlights: Should add Red Dog production information from November 1989 to present. Also need to include the number of jobs, amount of local purchases, local impacts on the villages, impacts on local unemployment, etc. Red Dog is has been a tremendous success story for the entire region and the plan should include this information. Other mines would have similar beneficial impacts and this should be made clear.	Red Dog Mine information is included in Chapter III, section (E) "Social and Economic Conditions". The costs and benefits of potential mining on Federal land have been addressed throughout this document. Chapter III, section (C)(3) "Minerals" is intended to identify mineral resource uses, without summarizing impacts. Also see the Mineral Occurrence and Development Potential Report, Locatable and Salable Minerals which is available on the BLM website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a>
52-43	Pg. 2-207. Figure 3-7: Label x axis by year rather than number.	Figure 3-7 was reformatted as suggested by the commenter.
52-43	Pg. 3-206. (4) last sentence: Contains contradictory information. Prior sentence states that production exceeded 1 million tons.	Thank you for your comment. This sentence was deleted.

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52-54	<p>Pg. 4-22: Consideration of hardrock/lode mining should be added. In the first paragraph on the page it states that because [of] the time needed to bring a hardrock deposit into production there would be no development...While such a statement may be correct for some deposits, it is not correct for other deposits. Much of the delay in developing mines is directly tied to the price of metals. When metal prices fall there is less exploration money available and less ability to develop new metal sources. If metal prices remain high, or if high grade deposits are found, they can be developed in a much shorter time frame. The Pogo Mine went from initial discovery to production in about 7 years and for Alaska, Pogo is a large mine. Pogo is in an area of effectively no previous mining, no infrastructure, and is about 50 miles from the nearest road. It is important that the analysis for hardrock mining be included in the plan. Pg. 4-144: Alternative D paragraph one states "It is expected that no new hard rock mines will develop during the life of this plan..." This is not correct. As stated above the primary factor is metal prices and if metal prices remain high it is very likely that new deposits could become mines rapidly. Pogo is just one example. Further, nearly all metal prices are now high (both precious metals and base metals) and if that continues the probability of new mines is even greater.</p>	<p>Pogo, by its location and proximity to an existing power distribution system, large population center, Fairbanks, and within 50 miles of a major highway network is not typical of conditions existing within the Planning Area.</p>

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52-55	Pg. 4-22: The third paragraph begins "Since 1989...primarily on private and state lands." The reasons listed are only partially correct. However, the two biggest factors were low metal prices and the extremely adverse investment and operating climate created by Secretary Babbitt. If any statement is made to the reasons for little activity on BLM lands these points must be listed.	Thank you for your comment. This paragraph was expanded to include additional reasons for limited activity on BLM-managed lands.
52-56	Pg. 4-22-23. 2. Hard Rock Exploration: No mention is made of the work being conducted on the Boulder Creek uranium prospect by Triex Minerals and Full Metal Minerals. This area has been explored for many years and these companies have begun a \$1.5 million exploration and drilling program.	This information post dates the development of the Draft RMP/EIS. The information used to develop the Draft RMP/EIS was the State's 2004 Mineral Industry Summary. BLM has decided not to revise the document to include more current information as doing so would not change management recommendations made in the Proposed RMP/Final EIS.
58-34	Outside these seasonal habitats used by caribou, hard rock mining in the Planning Area should be ROW avoidance areas and otherwise use regulations and permit stipulations to allow seasonal avoidance of caribou.	If proposals for hard rock mining are received by BLM, a site-specific plan of operations would be developed and impacts to caribou analyzed under NEPA. The ROPs (Appendix A) would apply as appropriate. If necessary, additional site-specific mitigation measures could be considered during approval of the mining plan of operations.
58-36	In the case of hard rock mining, or any operation requiring a plan, wording should be added that clarifies the plan must not only be completed but also approved by BLM based on the plan's ability to ensure all potential impacts of the requested activity on caribou are adequately mitigated and cumulative effects considered.	In a plan of operation an environmental assessment addresses all aspects of the environment identified in National Environmental Policy Act (NEPA). This includes caribou as well as other large game animals as other animal, aquatic and plant species in the area. BLM's approval is required for plans of operation.
64-16	Page 2-67, Mineral Materials, (c) Management Common to All Action Alternatives: Please state that guidelines and provisions regarding the disposal of mineral materials apply only to BLM-owned lands, especially regarding disposals on submerged lands, shorelands and tidelands.	Lands subject to tidal influence are not Federal lands, but are under the jurisdiction of the State of Alaska (reference U.S. Fish and Wildlife Service/Biological Services Program titled, "Gravel Removal Studies in Arctic and Subarctic Floodplains in Alaska", FWS/OBS80/09 printed June 1980).

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64-33	Pgs. 3-164 and 3-165, Figures 3-3 and 3-4: Consider including the full name for the various base metals, as well as their symbols, in the key to these figures for the lay reader.	Thank you for your comment. The legends for Figures 3-3 and 3-4 were revised.
64-34	Pg. 3-165 Second full paragraph: Please clarify the following phrase in the second sentence: "...special congressional legislation that excluded mineral deposits from in Federal enclaves that preclude mineral development..."	Thank you for your comment. This correction was made.
65-83	Representatives of the mining, oil, and gas industries, and BLM staff, have indicated that there is little commercial interest in the leasable and locatable mineral potential of most unencumbered BLM lands. We are concerned about the integrity of any entity that would be interested in pursuing exploration and development activities on such marginal-value lands...[and] about the environmental impacts of mining activities on these lands, considering that the financial viability of such activities appears to be questionable. It would be inappropriate for BLM to allow these activities unless it is fully prepared to justify covering the costs (using taxpayers' dollars) to remediate hazardous or unsightly mining operations and reclaim the land if the claimant fails to perform these functions.	We have no statute authority to determine the viability of a mining operation on public lands. As long as the plan submitted meets the regulatory reclamation standard or can be mitigated and the appropriate performance/reclamation bonding posted, the operation will be approved. New processes and deposit models are being developed all the time by competent mining industry geologists as well as Federal and State government professionals. The fact that there is currently little commercial interest in these marginal lands would not in itself be a viable reason to close these areas to future exploration/development.

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65-85	Should BLM lift the ANCSA 17 (d)(1) withdrawals...these lands would become subject to the 1872 Mining Law. This 133-year-old law allows private companies to take valuable minerals from public lands without regard for other potential values or uses of the land, without operating standards to protect the environment, without paying a royalty to the taxpayer and without regard for mining's impact to special places. Hardrock mining is practiced in a manner inherently threatening to human health to people living near, downstream or downwind from mines.	BLM has no statute authority to rule on the potential viability of a mineral resource extraction operation. Under NEPA and other related statutes, potential impacts to other resources can be avoided or mitigated and the extraction plan modified accordingly. The General Mining Law (as amended) was promulgated to encourage the development of mineral resources on unappropriated public lands as a way of encouraging development, expansion of a transportation network, development of commerce and providing employment for citizens of the United States. This was the prevailing philosophy as recently as 1976 when the Federal Land Policy Management Act (FLMPA) was passed, which in effect promoted the philosophy that the "Public lands" are "government lands." This reflected the change in philosophy that the government should receive a direct return to its coffers money generated by the development of mineral resources from these lands rather than an indirect benefit by encouraging economic development. Until the Congress acts to amend or repeal the General Mining Law, BLM will not be initiating policies that would be in direct conflict with enacted Law.
197-25	There should be absolutely no sale of mineral materials from river beds. One can just imagine what took place during the early gold rush days when miners dredged gold from river beds and totally ruined spawning grounds.	Studies done by the U.S. Fish and Wildlife Service show that mineral materials removal can be adequately mitigated so as to not be deleterious to anadromous fish habitat. The gold mining that took place in the early gold rush days is a totally different mining method than used for mineral material extraction and in those days gold mining was totally unregulated by law or regulation. Aside from beach materials and barrier islands along coastal areas the only other potential source of mineral materials would be glacial deposits. Glaciation within the planning area is very limited in extent. Due primarily to their bulk, mineral materials are developed for project use in close proximity to the planned development project, otherwise the project would not be viable.
<b>LEASABLE MINERALS</b>		
1-8	The oil spill data is minimized purposefully when it is in fact happening every day.	FEX L.P Drilling Company production in the National Petroleum Reserve-Alaska for the month of April 2006 yielded the following quantities of released fluids: <15 gallons of drilling muds, 4.5 gallons of diesel, 1 quart of transmission fluid and 2 gallons of engine oil. These fluids were either released into containment, or onto snow covered surfaces. Releases to surface are collected and sent to a central processing facility for treatment. General North Slope Oil Spill protocol can be accessed via web by going to <a href="http://alaska.bpweb.bp.com/hsea">http://alaska.bpweb.bp.com/hsea</a> .



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1-12	The Standard [lease] Forms allow dirt cheap prices/rates to be paid for the use of national taxpayer owned land. This constitutes a rip off of national taxpayers by BLM.	The minimum royalty of 12.5% is not established by BLM, but under Section 17 of the Mineral Leasing Act of 1920, as amended, for leases offered through competitive bidding in areas of Known Geologic Structures. Regulations that govern the BLM's oil and gas leasing program are found in Title 43, Groups 3000 and 3100, of the Code of Federal Regulations. Congress passed the Federal Onshore Oil and Gas Leasing Reform Act of 1987 to require that all public lands available for oil and gas leasing will be offered first by competitive leasing. Non-competitive oil and gas leases may be issued only after the lands have been offered competitively and not received a bid. The royalty generally charged for conventional oil and gas development on public lands is 12.5%. Royalty rates may be reduced for all or portions of a lease if the Secretary determines that such action is necessary to encourage the greatest ultimate recovery of the leased resources, or is otherwise justified. In addition to royalty, annual rental rates for both competitive and noncompetitive leases are \$1.50 per acre (or fraction thereof) in the first 5 years and \$2.00 per acre each year thereafter. Lessees pay royalties to the Department of the Interior's Minerals Management Service on the amount or value of the oil or gas removed or sold from each lease. Lessees must pay a minimum royalty at the end of each year beginning on or after a discovery of oil or gas in paying quantities. For those Federal leases in Alaska located outside of the NPR-A, the State of Alaska receives 90% of all royalties collected by the MMS.
43-1	I am very against a road to Red Dog [to] that coal bed [Arctic Slope Regional Corporation Land], I would be very against that. I think it would be devastating for the caribou and to all our people.	The RMP/EIS has taken a hard look at the impacts of the various activities that may take place on BLM-managed lands during the life of the plan. The location of the proposed road (Red Dog to the Deadfall Syncline) is unknown at this time. However, should it include BLM-managed lands, the RMP/EIS implements a number of ROPs to mitigate impacts. In addition, additional NEPA analysis would be done at that time and impacts to caribou and subsistence would be considered.
52-8	Pg. 2-12 Table 2-1: The table should indicate that oil and gas leasing stipulations 6 and 7 would apply to Alternatives C and D if that is the case.	While it is a good suggestion, it would be redundant. The ROPs and Stips apply to all leasable mineral activities in Alternatives B, C, and D unless otherwise noted.
52-20	Pg. 3-146 (3) Minerals: The geographic location of many of the features discussed in this section need to be identified on a map. These would include the wells listed in the Colville Basin (Eagle Creek #1, Tungak Creek #1, and Akulik #1) and Kotzebue/Hope Basin (Cape Espenberg and Nimiuk Point).	Five wells have been added to Map 3-27.

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	52-21	Pg. 3-148 Development Potential: In the discussions of plays, it would be helpful to maintain consistency in use of units. Either use acres or square miles not both.
52-22	Map 3-27: Labeling of the oil fields on the map would be useful. The Coal Map 3-28 is better.	Labels have been added to Map 3-27.
52-23	Pg. 3-150: The reserve/resource estimates for the Cape Beaufort and Lisburne Fields should be included? Merritt, 1985 (PDI 85-20, p.7) references 20 million tons in the Kukpowruk field which is part of the Cape Beaufort Field. This area has an extremely large potential for coal development and further discussion of the coal potential is needed.	Additional coal field and district information, addressed in the Mineral Occurrence Report for Leasable Minerals, has been added to Chapter III, section(C)(3)(a)(2) "Coal".
52-24	Pg. 3-151. Chicago Creek Field: Merritt, 1985 (PDI 85-20 p.9) also reports that the field produced 110,000 tons mostly from Private NANA Corp lands.	Additional coal field and district information, addressed in the Mineral Occurrence Report for Leasable Minerals, has been added to Chapter III, section(C)(3)(a)(2) "Coal".
52-25	Pg. 3-151. (3) Geothermal: The location of Pilgrim Hot Springs KGRA should be shown on a map.	The Pilgrim Hot Springs Known Geothermal Resource Area (KGRA) has been added to Map 1-2.
52-26	Pg. 3-152. (4) Coalbed Natural Gas: The existence of shale hosted natural gas should also be discussed. Teck Cominco at Red Dog is investigating the potential for shallow gas in the area as a possible alternative source of energy for the Red Dog Mine. Natural gas from all possible sources should be discussed. This gas has the greatest potential for countering the extreme cost of energy in the villages of the planning area.	Additional information on shale-hosted natural gas at the Red Dog mine, addressed in the Mineral Occurrence Report for Leasable Minerals, has been added to Chapter III, section (C)(3)(a)(4) "Coalbed Natural Gas".

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52-53	Pg. 4-16 - 6. Oil Spills: The number of oil spills assumes production during the life of the plan. This is not realistic given the normal time frames required to develop a field following discovery.	During the planning process, BLM must project future exploration and development activity. It is not likely that Oil and Gas leases will be let in this remote area of Alaska. If leases are let, we have to assume production will occur within the timeframe of the lease. Given that production is associated with fluids escaping to the surface, we must develop a spill scenario to compensate for the associated releases, however unlikely.
52-58	Pg. 4-205. 4th bullet: Oil prices are now more than double the \$30 per bbl level at which the Northwest JAP/EIS predicted increased oil and gas exploration activity.	During the planning process, BLM must project future exploration and development activity. In order to develop these projections BLM makes assumptions regarding the business decisions made by oil and gas companies. Oil and gas prices are the single most important factor controlling the amount of future drilling and production activity in Alaska. We also understand the speculative nature of price forecasting but know that the oil and gas industry uses price forecasting to evaluate the feasibility of new initiatives and make sound investment decisions. To offset price volatility, and because oil and gas developments require long-term investments, we assume companies base their investment decisions on conservative price projections. Informal comments by industry suggest companies are likely to scale activities according to average historical prices of oil and gas which are about half of current prices.
52-61	Pg. 4-216. 2nd paragraph, 1st sentence: Suggest inserting "leasable" between "from" and "mineral exploration" to differentiate this activity from the other types of minerals.	The following change has been made to Chapter IV, section G(3)(c)(1)(a), "Fluid Leasable Minerals" (first sentence of the last paragraph): "Roads resulting from mineral exploration and development (leasable, locatable, and salable) including community related activity, would add infrastructure to a region largely without and could increase interest in fluid leasable exploration on BLM-managed lands by reducing logistics costs."

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58-37	<p>No leasing or activities associated with the development of coal bed methane or oil and gas should occur within the primary calving ground (90% kernel analysis) (Figure 2), critical insect relief habitat (75% kernel analysis) (Figure 3C), migratory corridors in central Unit 23 (Figures 4 and 5), and winter range in the Nulato Hills. Outside of the core habitat protection areas (described above), strong stipulations should be developed (in collaboration with caribou managers and scientists from state and federal agencies and universities) similar to those on the North Slope in order to minimize impacts to caribou.</p>	<p>BLM leasing activities are unlikely to occur in the primary calving grounds because these lands are all high priority State and Native selections and will not remain under BLM management. Leasing is unlikely but could technically occur in insect relief habitat, migratory corridors and winter range in the Nulato Hills. Leasing stipulations and ROPs (Appendix A) were developed to protect habitat and reduce impacts on caribou. These Stips and ROPs are very similar to those used on BLM leases on the North Slope.</p>
58-40	<p>If coal mining is permitted, it should not be allowed within the primary calving ground (90% kernel analysis) Figure 2), critical insect relief habitat (75% kernel analysis) (Figure 3C), migratory corridors in central Unit 23 (Figures 4 and 5), and winter range in the Nulato Hills. These seasonal ranges should be considered ROW exclusion areas. Outside these seasonal habitats used by caribou, coal mining in the Planning Area should be ROW avoidance areas and otherwise use regulations and permit stipulations to allow seasonal avoidance of caribou.</p>	<p>As discussed in comment #65-89, coal leasing and development is deferred. Therefore, no coal mining will be permitted unless the Plan is amended to allow it. Additional seasonal restrictions and stipulations could be developed at that time to protect caribou. The plan does allow for coal exploration. Because calving is the time caribou are most sensitive to disturbance, ROP FW-3a prohibits coal exploration activities within the WACH calving area from May 20-August 15. Coal exploration activity would be allowed during other times of the year, when caribou are more dispersed and less sensitive to disturbance.</p>

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64-47	Pg. 4-135, Alternative A, (a) Oil and Gas Leasing; Pg. 4-136, Alternative B (a) Oil and Gas Leasing; Pg. 4-138, first full paragraph, last sentence: The logic of the concluding sentence of the section could be interpreted in several ways. If oil and gas exploration is limited or does not occur, these resources are not available in the near future for the next generation. However, if the development does not occur, these resources are still in the ground and consequently available for future generations to develop. Might it be more appropriate to conclude that these resources would be unavailable during the life of this plan, rather than "for future generations"?	The examples used in these alternatives are from a hypothetical standpoint. A proposed project "could" be uneconomic or "could" be technically unfeasible to drill. We have changed the wording in Chapter IV, section (C)(3)(a)(1)(a) "Oil and Gas Leasing" and (C)(3)(a)(2)(a) "Oil and Gas Leasing" to reflect the hypothetical nature of the examples. It now reads: "Consequently, these resources "could" be unavailable for future generations."
65-88	Although we prefer watershed-based approaches to managing rivers and river-related resources, we support the Alternative D proposal to close 1,059,000 acres of lands currently available to coal exploration and non-energy leasable minerals prospecting, as identified on page 2-53 of the draft RMP. These areas include: a) northern Nulato Hills; b) 300-foot setback on the following rivers: Pah, Shaktoolik, Ungalik, Inglutalik, Tubutulik, Kuzitrin, and Fish Rivers, and west bank of the Noatak River; c) 300-foot setback from mean high water mark on Boston Creek, Koyuk Creek, Peace River, Agiapuk River, and upper Kivalina River.	Support for this portion of Alternative D is noted.

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65-89	BLM [should] close the southern Nulato Hills and the BLM-managed lands on the Lisburne Peninsula to solid mineral development in the Final RMP/EIS, as proposed in Alternative C. It is apparent from Map 2-9 that no occurrences of coal exist in the southern Nulato Hills...[and] only a small portion of the northern and western Lisburne Peninsula possesses coal occurrences or coal fields.	The Nulato Hills and portions of the Lisburne Peninsula currently have no known coal potential, and likely will not have any interest in coal exploration over the life of the plan. The Proposed RMP/Final EIS defers coal development until interest is expressed by industry. The plan does however, allow for coal exploration. In preparing a land use plan, BLM does not make planning decisions based on mineral values (high or low) but on multiple use and sustained yield. The goal is to maintain or enhance opportunities for mineral exploration and development while protecting other resource values. In fact, BLM encourages development by private industry of public land mineral resources, and promotes practices and technology that least impact natural and human resources.
65-90	BLM [should] close the watersheds and tributaries of the Ipewik and Kukpuk Rivers to solid leasable minerals ...to protect critical nesting habitat for raptors. A setback should be applied which protects the full extent of riparian habitat on the Ipewik and Kukpuk Rivers (300-foot minimum setback).	Habitat for nesting raptors can be protected without closing these watersheds to solid leasable mineral entry. Appendix A includes many ROPs that are designed to protect riparian habitat. ROP FW-3b implements the USFWS recommendations for land clearing in Migratory Bird Habitat.
65-92	We request that vast majority of the BLM-managed lands on the Lisburne Peninsula, excluding the locations identified on Map 2-9 as possessing coal occurrences or coal fields, are permanently closed to solid leasable mineral development in order to promote and protect the region's caribou habitat and subsistence resources.	BLM has a multiple-use mandate which includes responsible mineral development. Our analysis in this RMP/EIS process has taken into account potential solid leasable mineral exploration and development on BLM lands, and we feel that there is adequate protection for the caribou habitat by applying Required Operating Procedures (Appendix A). Solid mineral development is not likely to occur in this location throughout the life of the plan. As noted under comment #65-89 the Proposed RMP/Final EIS defers coal leasing and development.
65-95	BLM should convert mitigation measures that seek to protect other resources to stipulations attached to any oil and gas and mineral leases to assure that they are enforceable, especially when they have the potential to impair the value of a lease.	Mitigation measures (ROPs), developed through this RMP/EIS process, are required and therefore, enforceable. Leasing Stipulations involve a "taking" (setting aside an area of a lease that makes it unavailable either by No Surface Occupancy (NSO) or by a seasonal restriction) while a ROP limits an activity. ROPs do not necessarily decrease the value of a lease. Stipulations can make a lease tract less economic (because of the "taking" concept). In order to manage the land for multiple use, an interdisciplinary team of BLM resource specialists have identified those resources that need additional protection (whether by NSO, or seasonal restrictions) and proposed the Stipulations in Appendix A. The idea is not to block mineral activity but to protect sensitive resources.

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312-1	The people live off all that the land and sea provide... If the oil spills and corrupts the land people will suffer greatly.	The ROPs (Appendix A) include many measures to prevent oil spills as well as to respond to spills in the event a spill occurs. In addition, there is a large number of Federal, State, and local regulations aimed at preventing spills.
<b>RECREATION MANAGEMENT</b>		
<b>SQUIRREL RIVER SRMA</b>		
13-1	I encourage BLM to restrict/maintain the hunting/fishing use of the Squirrel River for recreational purposes by non-natives because of the unwanted impact on our traditional subsistence way of life...Our children would learn the untraditional ways and rivers would become polluted due to more outsiders coming in.	See response to comment # 116-2. Any limit on visitor use days in the development of a RAMP would include all individuals, both Native and non-Native.
14-2	...Conflicts in the Squirrel River have yet to be resolved, we support the SRMA proposed under Alternative C as a way to deal with the problem. The vast majority of these lands are unencumbered BLM land, and we see no reason for BLM not to adopt the most strict of the proposed requirements in order to eliminate the causes of conflict. AQRC believes BLM has an opportunity to preserve nonmotorized hunting and to equalize hunting opportunities in this area by adopting the permit requirements and OHV limits set forth in Alternative C.	See response to comment # 116-2.
24-6	The lack of enforcement is likely a root cause of the Squirrel River issue and unless recognized and addressed, will remain an issue.	Thank you for your comment. BLM's law enforcement and staff conducts periodic field exams within budget constraints.

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25-20	While I prefer Alternative C [regarding management in the Squirrel River], from personal experience I have come to believe that the number of visitor use days permitted are too high, especially as there is additional non-local use that enters the area without employing a guide or transporter.	See response to comment # 116-2. Visitor use days would include all users (local, commercial, non commercial) and the appropriate number will be developed through a RAMP for the Squirrel River.
25-21	In order to protect the recreational, subsistence and wildlife values of the Squirrel River that BLM not only follow Alternative C, but add an amendment specifically stating that ADF&G be included when determining the number and nature of commercial permits issued for BLM lands.	See response to comment # 116-2. We consult with ADF&G during the NEPA process in assessing impacts to BLM lands and resources when Special Recreation Permits are proposed in a given area. We look forward to working with ADF&G in the development of a RAMP for the Squirrel River SRMA.
26-1	The Squirrel River is a situation ripe to explode. I think that limiting ATVs or off-road vehicles, whatever the term is, is a good idea there. I think boat access and generally limiting access would help solve the problems. The caribou move through there at a time when there is not much snow, in mass, and that is when the real problem exists. I think later in the season, I don't see a great need at this point for transport regulation after the snow flies. In fact generally, within this book, I found it odd that the 2,000 pound limit applied during the snowy months. Once the grounds frozen, its nearly bomb proof and I see every reason in the world to have a 2,000 pound limit thawed months. But during the frozen months, I don't.	See response to comment #116-2. We believe that the 2,000 pound limitation is needed even during frozen months. Use of vehicles weighing more than 2,000 pounds can be permitted by BLM if necessary.



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31-2	That means they can allow permits, so many permits, and they can allow so much within the Squirrel River, is that correct? So that they can continue to hunt and fish. The numbers that you put out here saying maybe 1,400 [Visitor Use Days] can enter within this time period. Do you [BLM] coordinate right now with the State about the numbers?	See response to comment #116-2. The 1,400 Visitor Use Day limit is not BLM's preferred alternative. Visitor use days, if necessary, will be developed through a RAMP.
31-4	I am really happy to hear right now that your trying to limit the number of [visitors] to the Squirrel [River]. We would like to know that locally we can have some kind of input to put numbers on those people, on the floaters, hunters. Because we're not floaters and hunters. We don't have the money to float and hunt.	Thank you for your comment. We look forward to working with concerned individuals in the development of a RAMP for the Squirrel River Special Recreation Management Area (SRMA).
35-1	I would like see some agencies [transporters] stop bringing by floatplanes up there. Last summer, a year ago, they brought a hunter up there, Squirrel River, and left him on an island. And pretty soon, sometimes over night, it started raining and water started coming up. And those hunters were almost drowned. And I would like to see it kind of slowed down bringing them hunters up there with a floatplane without no boats.	See response to comment #116-2. We agree that safety is an issue with transporters. We look forward to working with you on this issue.
36-1	I would like to see the BLM or whoever, a big agency give that land [Squirrel River] back to the natives. Because the natives were there first who used that land. And many of our subsistence camp has been given away to other people.	BLM's land transfer to ANCSA corporations, the State of Alaska, and individuals are set by specific acts of Congress.

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39-2	We see a lot of change in the migration. I take for instance the spring migration that goes north. They come through all the areas right now and they are not affected by anything [during spring migration]. We can see that the fall migration that goes south is affected by the noise and activity in Squirrel River.	Thank you for your comments and observations.
39-3	I would like to see that a guide be closely monitored and maybe with limited at 5 or 6 guides in there [Squirrel River].	See response to comment #116-2. We believe that prior to eliminating 50% of current guides, more participation is needed by user groups to determine the appropriate number of commercial operations in the Squirrel River SRMA.
39-4	The guide is also a transporter and he gets away with bringing more people in there. If somehow in the permit system that we could regulate the transporting also.	Permitting of air taxi and transporters in the Squirrel River will be considered during development of the Squirrel River RAMP along with other management issues. See response to comment # 116-2.
39-5	I think that date [August 1] is too early. It should be September 1st to October [dates to limit the number of visitor use days in the Squirrel River]. Because the caribou migration start about the 3rd, 4th week of August and if there is any noise or disruption then it changes the migration.	The August 1 date is not BLM's preferred alternative in terms of managing recreation use in the Squirrel River SRMA. See response to comment #116-2.
39-6	The 4-wheeler ...should be taken out of the hunts and the transporter and guide permit. We all walk when we hunt and they should do the same. They got their airplanes and their spotting systems and all that. And that is what we have to compete against. The 4-wheeler makes the access even better for them [non-local hunters].	Thank you for your comment. See response to comment # 78-4.

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40-2	I haven't really seen too, too much traffic up there [Squirrel River]. Other than the airplanes flying up there, you will see a few 4-wheelers. But I feel that they should look at limiting it because like they are talking about earlier, with the 4-wheelers, they will drive just about everywhere and interrupt the migration of the caribou. And I know that we can only limit BLM land but if we can look at, like I said limiting it to that area that they're, the caribou are trying to cross over.	Thank you for your comment. See response to comments # 78-4 and # 116-2.
40-3	If they [BLM] can work with the State at possibly closing off [to permitted activities] the [caribou] migrating areas up the Squirrel at a certain time. Say from the third week of August through the second week of September to give the caribou enough time to, at least the first herd, to migrate through and that way it doesn't disrupt the caribou migration. To work together to actually close them areas, so we can try to keep our herd going the way they are going. And we just talking about the fall [migration].	Thank you for your comment. See response to comments # 14-12 and # 116-2.
40-4	If we do have BLM lands that go through the migration area; if we can look at possibly trying to close those areas for guides or for transporters; to where they don't stop the migration. Because like we had a few other members [mention], they talked about how some [caribou] split off. But if you don't stop the main herd that is migrating through the pattern areas there. I feel that the caribou herd will keep coming through. So if we can look at possibly doing something in that route.	Thank you for your comment. See response to comment # 116-2

Letter # - Comment #	Comment	Response
	40-4	Can [we] look at moving the permit time from [to?] the second week of September through October. Maybe BLM possibly working with the State to see what we can come up with. So it will kind of concur with their hunting season or how they set theirs up. So it does not affect our subsistence hunting because we do a lot of subsistence hunting the third and fourth week of August and the first week of September.
41-1	I would also like to see further limitations to the number of transporters, and guides, and hunters. Particularly in the Squirrel River area and even more specifically in the, during the fall time because it does interfere with fall caribou migration. With the importation of hunters that come in from places other than this area. I really believe that it disrupts the caribou migration patterns when they are allowed to hunt and do what they will up in that area.	Thank you for your comment. See response to comment # 116-2
41-2	The last thing I would like to comment on are the dates for the permits to be given [required], August 1st through September 30th. It would be nice to see an extension or to move the date further down the road because of the global warming impact that we have had. Several people have commented on how with our weather changing, our weather patterns changing. And it's warmer a lot further into the fall time. It makes sense, more sense to people trying to get meat, preserve the meat, to do it later on when it's cooler.	We appreciate your observations. Specific dates will be established through a Recreation Area Management Plan for the Squirrel River. See response to comment # 116-2

Letter # - Comment #	Comment	Response
45-1	<p>We live off this land and especially the caribou, the migrating caribou from the North Slope area coming down through the Squirrel River area. And up north from here, from Ambler also coming down from the north toward our area where we live. And during the fall when they are coming down and the concern we have is the guides that are flown in the Squirrel River area. When they [guides] come in too early, they kind of block the caribou or kind of push them in the wrong direction, or kind of scare them away. In a sense, that they would maybe go in a different direction that isn't that.</p>	<p>Thank you for your comment. See response to comment # 116-2</p>
45-2	<p>if the BLM have some restrictions for guides down in the Squirrel area, I would think that they should put the same restrictions in our area, the Upper Kobuk so that there would be a balance of people, or hunters coming into our area. The same restrictions down in the Squirrel River and the same restrictions here in the upper Kobuk, the hunters might not want to come up here, knowing that the restrictions are the same in that area down there.</p>	<p>Thank you for your comment. See response to comment # 2-1 and</p>
50-3	<p>Selawik and Buckland get those caribou that cross the Squirrel River. And then they go through Selawik and then come here [Buckland area] when there's no hunters, game hunters. That's why we don't want nobody to mess around in the Squirrel River with airplanes. That's a whole wall that...the caribou are facing, of people.</p>	<p>Thank you for your comment. See response to comment # 116-2 and # 2-1</p>

Letter # - Comment #	Comment	Response
	52-12	Pg. 2-70 and 2-71: The Squirrel River should not be designated as a SRMA. Such designation would ultimately affect access to and potential development of mineral resources. We suggest that flexibility be retained in the guidelines but that no specific SRMA be established.
52-14	Pg. 2-84. Table 2-14: The RAMP developed would need to address access requirements to existing mining claims as well potential new discoveries.	The Squirrel River would be open to entry under the mining laws. The mining laws provide for access to valid claims.
58-54	The Working Group recognizes that user conflicts occur in Unit 23. We request that the Draft RMP/EIS reflect the following actions: 1) expand the Squirrel River conflict area to include other areas of conflicts in Unit 23; 2) use interim measures to limit recreational users at current levels while a Recreation Area Management Plan (RAMP) is developed for areas of conflict; 3) integrate with a Unit 23 cooperative planning process to develop a RAMP that reduces conflicts in Unit 23; and 4) provide options for long-term cooperative planning processes to alleviate future conflicts that may arise.	Thank you for your comment. We agree with all suggestions except for expanding the Squirrel River SRMA. Outside of the Squirrel River SRMA, future management will use the Recreation Opportunity Spectrum (Table 2.13 - ROS Classifications for the ERMA) developed for the Extensive Recreation Area in determining appropriate commercial use levels and BLM's management discretion afforded in 43 CFR 2932.26.
58-55	BLM [should] integrate the following components and ideas in the Recreation Management section of the Final RMP/EIS: Use people management tools and land use requirements to reduce user conflicts in the Squirrel River and other areas of conflict in Unit 23.	We believe that a RAMP developed for the Squirrel River and BLM's management discretion afforded in 43 CFR 2932.26 can be used to control future permits if conditions in the remaining ERMA area warrant a reduction in commercial use.
58-56	BLM [should] Use interim management measures to reduce conflicts while the Recreation Area Management Plan is developed.	We plan on holding SRP to current numbers and instituting a permit system for transporters and air taxi operators during the interim.

Letter # - Comment #	Comment	Response
58-57	BLM [should] Expand the scope of conflict areas beyond the Squirrel River to include area the Kauk River drainage and lands near Buckland	See response to comment # 14-12. BLM's management discretion afforded in 43 CFR 2932.26 can be used to control future permits if conditions in the Extensive Recreation Management Area warrant a reduction in commercial use.
58-58	Maintaining the status quo of transporters and current visitor activity for the next 5 years, as outlined in Draft RMP/EIS alternatives, is unacceptable and will likely lead to escalated conflicts	Upon review, BLM is committed to permitting air taxi and transporters during development of a RAMP. BLM's management discretion afforded in 43 CFR 2932.26 can be used to control future permits. See response to comment # 116-2
64-8	[T]he long-standing conflicts among user groups in Unit 23 appear to be escalating. We appreciate that the plan recognizes this issue and offers proposals in Alternatives C and D to address the underlying issues. We are very concerned, however, that the five-year timeframe for completion of a RAMP proposed in Alternative D will unacceptably delay resolution of this issue while BLM completes the RAMP. We urge BLM to move forward as quickly as possible to develop a RAMP for the Squirrel River SRMA.	Thank you for your comment. See response to comment # 116-2

Resource Uses

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Appendix J: Response to Comments

Letter # - Comment #	Comment	Response
	64-9	While we appreciate BLM's interest in taking a lead role, the proposed approach [Squirrel River RAMP], focusing on establishing general public use limits does not target the specific underlying issue, which focuses primarily on hunting-related conflicts. There are a number of agencies and entities with applicable management authorities that have roles and responsibilities related to finding an effective solution. To effectively address the conflicts, these entities must work cooperatively together on a coordinated response strategy. The State urges BLM to immediately begin work with ADF&G to cooperatively design a multi-agency process that could start as soon as the RMP/EIS Record of Decision is signed. The effort should include ADF&G, DNR, the Alaska Board of Game, the Alaska Big Game Commercial Services Board, and ...other agencies as appropriate.
65-21	This "preferred" alternative allows the long-standing problems and escalating conflicts among user groups of the Squirrel River (and adjacent watersheds) to continue for up to five years until a RAMP is completed.	Thank you for your comment. See response to comment # 116-2 and # 58-56.
65-22	The proposed interim strategy enables BLM to continue current, status quo management or take "No Action" in regard to limiting non-subsistence use in the Squirrel River conflict area while a RAMP is completed. This proposal is negligent and unacceptable, especially since the current management strategy has resulted in a negative finding for subsistence under Alaska National Interest Lands Act (ANILCA) section 810.	See response to comment # 116-2. We feel that capping the commercial guide use to current levels and instituting a permit system for air taxi and transporters will reduce subsistence conflicts.



Letter # - Comment #	Comment	Response
65-23	We support Alternative C, with modifications, and urge BLM to consider the following: 1) Expand the scope of the Squirrel River SRMA to include BLM administered lands in the Buckland region as well as the Kauk River drainage.	Thank you for your comment. See response to comment # 75-2
65-24	Squirrel River SRMA: 2) Prioritize the development and completion of a RAMP within the next 2-3 years	See response to comment # 116-2
65-25	Squirrel River SRMA: 3) Limit the numbers of clients for permitted guides & transporters.	This will be addressed through the proposed RAMP for the Squirrel River. See also response to comment # 116-2.
65-26	Squirrel River SRMA: 4) Require recreation permits for all non-subsistence visitors during the fall hunting season	Thank you for your comment. See response to comment # 58-63.
65-27	Squirrel River SRMA: Apply benefits-based recreation management principles in order to achieve a quality experience for both subsistence and non-subsistence hunters	The contemplated RAMP will accomplish this goal and we look forward to your participation.
65-28	Squirrel River SRMA: Law enforcement needed to enforce client limits and ensure meat is not wasted	Thank you for your comment. See response to comment # 24-6.
65-29	Squirrel River SRMA: Limit summer off-highway vehicle use within the Squirrel River SRMA, consider limiting to designated trails and implementing weight restrictions	Thank you for your comment. See response to comment # 116-2
65-30	Squirrel River SRMA: Adopt recommendations outlined in Resolution 2006-01 passed by the Western Arctic Caribou Herd Working Group. We see this resolution as a common sense approach to the current Squirrel River situation.	The issue in the Squirrel River will be addressed through the proposed RAMP. We look forward to working with the WACH Working Group in during development of the RAMP. See also response to comments # 116-2 and # 64-9.

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65-31	If it is within the authority of the BLM, we urge the agency to take action quickly to help resolve the long-standing competition and potentially hostile situation that has developed on the Squirrel River, and to protect this valuable caribou and moose habitat.	Thank you for your comment. See response to comment # 116-2
116-2	We request BLM accord SRMA status to 890,000 acres in the Squirrel River watershed as proposed in Alt. C... We support the proposed action to regulate transport of commercial users and instate seasonal limitations on visitor use days, which we feel will deter degradation of the area and minimize user conflict. We are concerned by BLM's Alternative D proposal to open lands within the Squirrel River SRMA to locatable and leasable mineral entry and we oppose lifting protective mining withdrawals from these lands.	We believe the Squirrel River SRMA will address conflicts between commercial, recreational and subsistence users. However, we feel that more participation by diverse user groups within a Recreation Area Management Plan (RAMP) will result in better management and increase public support and cooperation between user groups. We are committed to the development of a RAMP within 3 years of the Record of Decision (funding dependent). The RAMP would address recreational use taking into consideration current use levels, safety, resource impacts, operator tolerance, and quality of outdoor experience (See Table 2-12). Our steps of interim management before a RAMP is completed is to permit commercial air taxi and transporters to obtain better use numbers and limit commercial guide permits to a maximum of 10 as discussed in Chapter II, section (B)(2)(d)(6) "Alternative D." BLM's management discretion afforded in 43 CFR 2932.26 can be used to control future commercial use permits if conditions dictate. We have determined that a withdrawal from mineral entry is not needed in this area.
197-12	Pgs. 2-69 to 2-71. We are having caribou user conflicts crisis in Game Unit 23 and other areas in the Planning Area. BLM must take proactive steps with other Federal agencies, State of Alaska, Northwest Arctic Borough, Regional Advisory Councils, WACH Working Group, Guides, Transporters, and Air Taxi operators to resolve this situation. Immediate steps should be taken to reduce the number of non-local hunters in key migratory routes to minimize the amount of interference with migration of caribou.	Thank you for your comment. See response to comment # 116-2

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197-13	Interim measures to limit recreational users at or below current levels needs to be instituted in the Squirrel River and other areas to reduce user conflict. Five years is not an acceptable timeline for developing a RAMP in the Squirrel River SRMA. The plan must be developed much sooner than five years.	Thank you for your comment. See response to comment # 116-2
198-15	The draft RMP proposes to do nothing [in the Squirrel River] for at least the next 5 years regarding this issue [user conflict], except for maintaining the status quo for guides and outfitters while the Squirrel drainage is classified as a SRMA and a RAMP is developed. It is not possible for BLM to predict that impacts will not increase because there is absolutely nothing in BLM's current management or draft RMP that will prevent increased use by transporters, air taxis and their clients.	Thank you for your comment. See response to comment # 116-2
<b>SALMON LAKE/KIGLUAIK SRMA</b>		
14-1	We support the creation of the Salmon Lake/Kigluaik SRMA which would appear to offer the only opportunities in this Draft for quiet recreation, such as backpacking and skiing, which are readily accessible from a road system. While we recognize that both Alternative C and the Preferred Alternative propose this SRMA, we support the restrictions set forth in C, such as those imposed on OHV travel and not lifting withdrawals so that opportunities for quiet recreation are protected. Additionally, we strongly urge BLM to take affirmative steps in regard to helicopter/fixed wing tourism activity in this SRMA by setting up a monitoring and permit system through this RMP.	We feel that more participation by diverse user groups to address concerns over OHV use will result in better management and increase public support and cooperation between user groups. Therefore, we are proposing development of an activity level plan for this area. We believe that the level of fixed wing access is limited by geographic features of the landscape. Helicopter access would continue until user conflicts occur. We have no record of such conflicts to date.

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25-10	<p>I wholeheartedly oppose the proposed Kigluaik Mountain “semi-primitive motorized” proposal found in Alternatives C and D. The uniqueness of this area and its recreational potential will be severely diminished by motorized access during the non-snow season. There is almost no other place I know of that offers road access (on both sides) to such an outstanding wilderness area. Non-winter motorized vehicles already have access to an immense amount of country. This is one area that should be set aside for non-motorized use in snow-free months.</p>	<p>The preferred alternative in the Salmon Lake-Kigluaik Mountain SRMA for Travel Management/OHV use states that BLM may develop a future area-specific plan based upon resource values and management objectives that may limit OHV use to designated trails, seasonal restrictions, closures or weight limits (Table 2-15). We believe that current use does not warrant closure of this area to OHV use at this time. We believe that future OHV use restrictions above the 2,000 pound limitation will require more participation by diverse user groups within an area-specific plan, which will result in better management and increase public support and cooperation between user groups.</p>
26-2	<p>I hope that you consider the Kigluaik Mountains a recreational site. I think it would be a real shame to develop it much at all. I think a hiking trail through there would be a nice idea. I think in the winter months snowmachines are wonderful. But I would think ATVs in there in the summer would be a bad idea.</p>	<p>Thank you for your comment. Our preferred alternative designates the Salmon Lake-Kigluaik Mountain a SRMA.</p>
64-3	<p>The Kigluaik Mountains near Mt. Osborne were specifically mentioned in the State of Alaska Department of Natural Resources (DNR) Northwest Area Plan (NWAP) as recommended for state selection due to their values for “minerals, public recreation, subsistence and accessibility.” (Pg 3-48, NWAP). Alternative D proposes that a portion of these lands be set aside as the Salmon Lake - Kigluaik SRMA and, if retained in federal ownership, the Mt. Osborne Research Natural Area (RNA). Pg 2-106 of the RMP/EIS does not provide information regarding the rationale for designation such as specific ecological values.</p>	<p>Chapter III, section (C)(4)(b) "Special Recreation Permits, Commercial Uses, and Fee Use Areas" and section (D)(1) "Areas of Critical Environmental Concern and Research Natural Areas" of the Proposed RMP/Final EIS discusses the rationale for designation as a SRMA and ACEC. See page 3-212 and page 3-235 of the Draft RMP/EIS.</p>

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117-5	The entire valley [Grand Central Valley] including Mount Osborn needs to be off limits for mineral exploration. Access should stay as is by foot only.	We believe that mineral exploration and development can be regulated to protect resource values in this area without a closure to mineral entry. OHV management in an SRMA calls for the development of an area specific plan to address OHV use. We appreciate your position and look forward to working with you in the future to develop an Off Highway Vehicle plan.
477-1	We favor the designation of an ACEC to include the Kigluaik and Salmon Lake area as proposed under alternative C. We feel that preserving them for their scenic and recreational value, far outweighs the benefits of opening them to other uses, such as resource development. We were unable to assess whether or not stipulations addressed in Vol. 2 apply, but would like to see no stipulations that would allow development of any kind in this special area.	In the Preferred Alternative (D) of the Proposed RMP/Final EIS, the Kigluaik Mountains and Salmon Lake are identified as a Special Recreation Management Area, Chapter II, Section (B)(2)(d)(6) "Alternative D". The Mount Osborn area will be designated as an ACEC, Chapter II, section (B)(3)(a)(6) "Alternative D". These areas will be open to mineral entry subject to the ROPs in Appendix A which would apply to permitted activities in this area.
<b>RECREATION - GENERAL</b>		
2-1	One area of concern I have is that our Ungalik Inglutalik areas remain open to access for caribou hunting purposes and also that our traditional sites are, that are traditionally used those areas to for camp sites to hunt caribou. That those be respected, to remain available and accessible to our people. And those include the Inglutalik, Ungalik and Shaktoolik river areas that BLM has land permits.	Thank you for your comment. BLM's preferred alternative (D) as outlined in Chapter II, section (B)(2)(e)(6) allows OHV use off of designated trails for subsistence purposes by qualified subsistence users.

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	14-12	The BLM should require air taxi operators and transporters to obtain a recreation or special use permit prior to operating in Special Recreation Management Areas or Extensive Recreation Management Areas, and, as a condition of that permit, report their activity on an annual basis. Reports and data should be shared with other managing agencies in the Planning Area. This would improve the BLM's ability to identify activities that may be adversely impacting subsistence use or local wildlife resources. The Fish and Wildlife Service and the National Park Service currently require this of air taxi operators on their lands. If the BLM contributed to this shared database, a more comprehensive picture of public use for GMU 23 would be obtained, improving the information on which to base recreation and other management decisions.
14-13	The BLM should provide the local Field Manager the authority to approve or deny permits for activities within Extensive Recreation Management Areas, in consultation with other managing agencies and the Western Arctic Caribou Herd Working Group. This authority should also apply as an interim measure in proposed Special Recreation Management Areas during the planning process. Permits [should] be denied if proposed activities are determined to threaten a specific resource, limit otherwise legal public access, or negatively impact subsistence.	The Field Office Manager, located in Fairbanks and Anchorage, does have the authority to approve or deny Special Recreation Permits (SRP) for commercial use in the ERMA. The NEPA process is used to consult with groups and agencies affected by the proposed activity prior to a decision to approve or deny a permit. Proposed actions that threaten a specific resource, limit otherwise legal public access, or negatively impact subsistence are grounds for denial of a permit application.

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24-9	I am aware of problems with sport hunters in the Kobuk River area and feel strongly that much of the problem may be lack of enforcement but is also related to insufficient management actions by the State Boards of Fish and Game, and the Federal Subsistence Board, and BLM. No action [alternative] is not satisfactory.	Thank you for your comment. See response to comment # 75-2
24-18	Recreational cabins should not be allowed. Allowing recreational cabin permits will provide for fractionation of public lands which I believe is a systematic tool to erode Native culture. Our culture requires adequate wildlife refuges that are not owned by any one person, where fish and wildlife can flourish.	Thank you for your comment. See response to comment # 54-1.
25-9	I strongly oppose Alternative D [recreation management], and I only support Alternative C with modifications (given below.) There is a long-standing, well-established and escalating conflict among user groups in the Squirrel River and Kauk River drainages in Unit 23. There is concern that conflicts among user groups may lead to even more violent actions in the near future than it did in 1998 (when nonresident hunters were held at gunpoint along the Kobuk River drainage). BLM is in a position through this planning process to significantly reduce this problem if they act now. Alternative D allows the problem to continue unchecked for the next five years until the RAMP is completed.	We appreciate your concerns. See response to comment #58-54. We currently have only one special recreation permit in the Kauk River. In 2006, one application was denied. See response to comment # 116-2 to address your concerns in the Squirrel River. Interim management will be implemented in the Squirrel River during development of the RAMP.

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	27-1	More recently, there have been a lot of problems [with user conflicts] on the southern Baldwin Peninsula. There have been a lot of problems in the Buckland-Deering area. There have been problems in 22B, the area east of the Darbys, the BLM-Koyuk area and I would strongly urge you folks to, in those alternatives, like in C to look at perhaps applying some of those remedies in some areas other than just the Squirrel River.
45-3	I'm not sure when you are open and when you are closed [for moose hunting]. But I think it is a little bit too short, the open season. And by the time they are real good to harvest, I think it would be closed. And I think if you would encourage the Fish and Game somehow to keep it open a little longer, maybe another month. A month longer would be good subsistence thing for us.	Thank you for your comment. See response to comment # 105-1
49-2	I saw there is some talk about having training for these guides or the transporters or whatever. I think that's a good thing. Because they can learn something extra from people that have been doing it or have done something that's useful.	Thank you for your comment. BLM has not proposed any training but our understanding is that the State of Alaska's Department of Fish and Game is developing various media to educate hunters in GMU 23.
52-13	Pg. 2-70: The remainder of the area should not be designated as an ERMA. Recreation is one of many multiple uses for the area but an ERMA would add unnecessary restrictions to other forms of multiple use.	According to BLM planning guidance and policy, all lands not in a SRMA are by default in an ERMA. Other multiple use actions within the ERMA are guided by Regulation and the RMP. BLM contemplates a custodial role in the ERMA.



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	54-1	Cabin sites should be easier to obtain. This allows access to the country by having shelters where people can recover from weather, and stash spare gas and food. It should be a requirement that remote cabin sites are left unlocked for travelers in need of emergency shelter.
58-7	The WACH Working Group requests that all State and Federal resource management agencies, local and Tribal governments, guides and transporters, local subsistence hunters, non-local and non-resident hunters, and other recreational users of the herd participate in the cooperative planning process to find solutions to user conflicts during the fall hunting season in Unit 23.	Thank you for your comment. Our intent is to involve the WACH Working Group in the development of a RAMP. See also response to comment # 116-2.
58-59	BLM [should] Integrate with a Unit 23 cooperative planning process involving diverse user groups to assess conflicts and identify requirements, stipulations or procedures that will minimize, reduce and alleviate conflicts in the future.	Thank you for your comment. See response to comment # 116-2
58-60	BLM [should] Prioritize development of an activity plan (e.g. Recreation Area Management Plan) by integrating with a Unit 23 cooperative planning process to be completed in 2-3 years.	Thank you for your comment. See response to comment # 116-2
58-61	BLM [should] Allow the Working Group to make recreation management recommendations as BLM considers alternatives to minimize conflicts.	Thank you for your comment. We welcome your recommendations during the development of the EIS. See response to comment # 116-2
58-62	BLM [should] Use recreation permits for visitors in identified conflict areas within the Planning Area.	Thank you for your comment. See response to comment # 116-2

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58-63	BLM [should] Allow exemption from permitting requirements for local residents who demonstrate traditional use of the conflict area.	If BLM institutes a permit system for users through development of a RAMP, all users will be subject to the permit regardless of residency.
58-64	BLM [should] Regulate the number of transporters through the use of permits. Require air taxi operators and transporters to obtain a recreation or special use permits from BLM prior to operating on BLM lands (SRMAs or EMRAs). Use permit conditions to require annual reports of their activities within the Planning Area. This would improve BLM's ability to identify areas that may be adversely impacting subsistence use or local wildlife resources. USFWS and NPS are currently requiring this of transporters on their lands. If BLM could contribute to this shared database a more comprehensive picture of public use for Unit 23 could be obtained.	See response to comments # 116-2 and # 14-12. BLM's management discretion afforded in 43 CFR 2932.12 (a) can be used to control future permits if conditions in the remaining ERMA area warrant a reduction in commercial use.
58-65	BLM [should] begin using 'commercial use authorizations' to limit the number of transporters and air taxi operators in areas of conflict; interim measures should cap activities at current levels while an accelerated planning process is implemented	Thank you for your comment. See response to comments # 116-2 and #14-12.
58-66	BLM [should] Continue to restrict guides with 'commercial use authorizations' at the current levels;	Thank you for your comment. See response to comment # 116-2.

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58-67	<p>BLM [should] Develop special conditions for recreation permits and commercial authorizations:</p> <p>a) Designate 'allowable camping areas' and 'no camping areas'; during August, September and October avoid camps on the north side of major rivers to allow normal passage of migrating caribou; b) Limit the total number of camps by time and space; use current density rates while cooperative planning process seeks solutions; c) Limit the total number of clients for transporters in areas of conflict; use current visitor rates while cooperative planning process seeks solutions; d) Require seasonal reports from permittees detailing the GPS location, duration, and occupancy (number of people) of all camps maintained in identified conflict areas in the Planning Area; e) Limit timing and density of visitor access to prevent deflection of migrating caribou.</p>	<p>We welcome information from the WACH Working Group as to specific conditions and the rationale behind those conditions and hope that these ideas will be brought forward in the development of a RAMP in the Squirrel River SRMA. See also response to comment # 116-2.</p>
58-69	<p>Provide the local BLM field manager the authority to deny permits for areas within an EMRA where: the permitted activity would threaten to deplete or harm a resource (e.g. prohibit public access) or negatively impact subsistence. This authority should also apply as an interim measure in proposed SRMAs during the planning process.</p>	<p>Thank you for your comment. See response to comment #14-13.</p>

Letter # - Comment #	Comment	Response
62-1	<p>BLM should modify and adopt Alternative C to include: A) The drainages of the Koyuk, Inglutalik, and Ungalik Rivers: Nulato Hills and Bendeleben Mountains would be managed as a Special Recreation Management Area (SRMA); B) Limit number of SRP user days (up to 180 VUD to commercial guides per area) based upon current use levels, resource impacts, operator tolerance, and quality of recreational experience; C) Require transporters to obtain permit, which may be denied based upon lack of history of prior use levels, resource impacts, operator tolerance, and quality of recreational experience; D) Limit the number of commercial guiding operations to 2; E) No facilities would be developed or permitted to enhance visitor use.</p>	<p>We feel that the recreational use in these areas does not warrant a SRMA at this time. BLM's management discretion afforded in 43 CFR 2932.26 can be used to address conflicts between commercial permit operators if conditions (guides, air taxi and transporters among others) dictate. The Preferred Alternative in the Proposed RMP/Final EIS would manage these areas as part of the ERMA. See also response to comment #75-2.</p>
62-2	<p>BLM should modify and adopt Alternative C to include: A) Agiapuk and Buckland River drainages would be managed as a Special Recreation Management Area (SRMA); B) Limit number of SRP user days (up to 120 VUD to commercial guides per area) based upon current use levels, resource impacts, operator tolerance, and quality of recreational experience; C) Require transporters to obtain permit, which may be denied based upon lack of history of prior use levels, resource impacts, operator tolerance, and quality of recreational experience; D) Limit the number of commercial guiding operations to 2; E) No facilities would be developed or permitted to enhance visitor use.</p>	<p>We feel that the recreational use in the Agiapuk and Buckland Rivers do not warrant a SRMA at this time or into the foreseeable future. BLM's management discretion afforded in 43 CFR 2932.26 can be used to address conflicts between commercial permit operators if conditions (guides, air taxi and transporters among others) dictate. See also response to comment #75-2.</p>

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62-3	The past use history and the current use patterns in the Koyuk, Inglutalik and Ungalik Rivers show no use what so ever by non-guided, air-taxi, drop-off transporters. If it is the intention of the BLM to limit the VUD to a low number it should be made clear that those VUD are intended for guided hunts.	The Preferred Alternative in the Proposed RMP/Final EIS guides future management within a Recreation Opportunity Spectrum developed for the Extensive Recreation Area in determining appropriate use levels. See also response to comment #75-2.
64-49	Pg. 4-158 (7): "The establishment of visitor use limits in specific areas would help ensure positive recreation experiences for commercial and non-commercial users while protecting the resources." It is the State's position that this conclusion results from a rather myopic view of management tools available for managing human use. We appreciate the fact that BLM recognizes that visitor use limits could also limit recreational opportunities for some. The State again wishes to emphasize that there are a variety of tools available to manage human use and protect resources that should be implemented before restricting general public use of an area.	Thank you for your comment. We look forward to working with the State of Alaska in the development of a RAMP for the Squirrel River SRMA to address user conflicts.
64-55	Pg. C-3, Table C-1, Recreation Management, Alternative D: review Alternative D. The text refers the reader to Alternative B, with a provision that no limits would be set on visitor use days for the Kigluaik Mountains. Alternative B refers the reader to Alternative A, with a statement that no major actions would be taken to enhance recreational opportunities. We suggest that this section of the table be reviewed and clarified if necessary. There are no references to limits on general visitor use days in either Alternative A or B.	Thank you for your comments. Table C-1 has been reworded to clarify the intent.

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75-2	Koyuk people desire limitations to be placed on the number of special permits authorized including on the volume of visitors permitted.	We acknowledge your desire to limit the number of special recreation permits. The Proposed RMP/Final EIS lays the groundwork for determining what level of commercial recreation use may be appropriate in your area. Future management will use the Recreation Opportunity Spectrum developed for the Extensive Recreation Area as showing in Table 2.X "ROS Classifications for the ERMA" in determining appropriate commercial use levels as well BLM's management discretion afforded in 43 CFR 2932.26.
78-1	[T]he unregulated nature of commercial recreational activities currently occurring on BLM land in the region is negatively impacting caribou migration, wildlife habitat and populations and thus affecting subsistence opportunities and needs. The Tribe recommends immediately devising a regulatory user permit system that deals specifically with commercial recreational activity (i.e.. guide and transport service activities carried out on BLM-managed lands) and a system that does not lump subsistence users into the same permit requirements as persons receiving or paying for transportation services to access BLM lands for the purpose of recreating.	We share your concerns over user conflicts and any negative impacts over caribou migration, wildlife habitat and populations and subsistence opportunities and needs. See response to comment # 116-2.
78-5	Any Extended [Extensive] Recreation Areas should have language allowing for the close management of guides and transporters as they may impact subsistence users and priorities	See response to comment # 75-2. Any Special Recreation Permit request receives an ANILCA 810 analysis of the effects upon subsistence users. If significant impacts to subsistence can be demonstrated, BLM may deny a permit.
105-1	Nowadays we see a lot of Natives being harassed by Fish and Game, etc. when a lot of non-natives fly out with the heads only and wasting precious meat. We need better enforcement of that on the lands.	The regulating and harvest of fish and game is done by the State of Alaska and the Federal Subsistence Board, not BLM. We share your concerns over wasting any game animal.

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197-20	BLM must do more to monitor resource populations important for subsistence users, especially in lands where access to BLM lands is unlimited. Commercially guided Fisheries is probably the next user conflict waiting to happen. The Planning Area contains some of the world class fisheries for Arctic char, sheefish, and Arctic grayling and these areas will soon be exploited by guides and transporters for clients who want to fish at the same time they are hunting big game.	Thank you for your comment. Alternative D of the Proposed RMP/Final EIS provides the groundwork to address future conflicts involving commercial guides. See also response to comment #75-2.
197-21	Management decisions on permitting activities and hunting guide permits must include transporters and air taxi operators. Conflict among subsistence users and sports hunters is real and must be acknowledged and addressed.	Thank you for your comment. See response to comment # 116-2.
<b>TRAVEL MANAGEMENT</b>		
8-1	Having flown over the state extensively for 40 years, one of the most significant changes is the 4-wheeler trails. There are few areas within 50 miles of the road system that are not criss crossed with 4-wheeler trails that were not there 40 years ago. It might be wise for future users to somewhat [limit] 4-wheeler use.	Thank you for your comment. The preferred alternative is to limit OHV use to 2,000 pounds. In any ACEC and SRMA (Table 2-15) area-specific plans may further limit OHV use based upon resource values and management objectives. See response to comment # 78-4.
14-4	Attempting to regulate OHVs on the basis of the State's Generally Allowed Uses is a paper exercise at best. We recommend that requiring OHVs to remain on designated trails in the non-winter season should be the standard adopted by BLM on all the lands it manages.	Thank you for your comment. However, we feel that more participation by diverse user groups prior to designation of specific OHV trails use will result in better management and increase public support and cooperation in OHV management. See also response to comment # 78-4.

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	58-70	Off-Highway-Vehicle considerations are closely related to recreation management in the Planning Area. Damage to vegetation is accelerated with the use of multi-wheel OHVs (e.g. Argo type vehicles). These vehicles should not be permitted in the ice-free season when unfrozen soils are damaged by the opposing rotation of wheels (axles) to allow directional control of the OHV.
64-31	Page 2-139, Effects on Travel Management / OHV: Please review the next to the last sentence in Alternative D. We assume that the sentence should read: "The current free and unrestricted OHV use would be somewhat diminished compared to Alternative A."	Thank you for your comment. This was corrected.
64-37	Pg. 3-218, fourth full paragraph: We suggest that in addition to citing the "Conditions for Generally Allowed Uses" and 11 AAC 96.025, BLM may wish to reference those portions of 11 AAC 96.025, "Conditions for Generally Allowed Uses" which specify that Generally Allowed Uses are subject to a variety of operating conditions.	Our intent was to reference the entire AAC 96.020 and 96.025 as the operating conditions are spelled out in the code. As the commenter noted, the Generally Allowed Uses are subject to a variety of operating conditions. E.g. using an all terrain vehicle with a curb weight of up to 1,500 pounds off road is allowable without a permit "if use off the road easement does not cause or contribute to water quality degradation, alteration of drainage systems, significant rutting, ground disturbance, or thermal erosion."
64-50	Pg. 4-159, first full paragraph, last sentence: What is the "degree of uncertainty that remains as to the future implementation-level planning and the impacts of limiting OHV use to designated trails or seasonal closure of areas"? Does this imply that implementation-level planning may or may not occur, or does this mean that the results of implementation level planning may have further impacts to OHV use and cannot be determined at this time?	OHV plans for areas designated as ACECs and SRMAs are subject to staffing and budgetary constraints. There is uncertainty as to when those plans will be completed and also what specific restrictions will be implemented in the plans. Since both an OHV plan date and content is uncertain, we cannot with certainty determine the environmental effects of future impacts.



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64-51	Pg. 4-160, Table 4-11: Under Alternative D, please specify the seasonal period for "Limited to 2,000 pound GVWR seasonally" for Alternatives A and D; or if there are no seasonal restrictions in these alternatives, please clarify.	Table 4-11 was revised to clarify. Refer also to the Table 2-14. Under alternative A the entire planning area is limited to a 2000 pound weight limit yearlong. In Alternative D, areas outside of ACECs or SRMAs are limited to a 2000 pound weight limit yearlong. However in SRMAs and ACECS, additional restrictions may be imposed on OHVs based on a RAMP or OHV plan.
67-1	Recreation Management (pg 2-73): I am opposed to the proposed Kigluaik Mountain "semi-primitive motorized" proposal found in Alternatives C and D and favor amending the language to allow foot access only. Naturally occurring rock and scree fields protect the heart of the area from access by four wheelers, thus the upper drainages provide a refuge for moose during the rut, the mountains are an important denning area for bears and the alpine lakes contain a genetically unique subspecies of char. It would be a travesty to open up this natural refugia to motorized access, when so much of the Seward Peninsula is easily accessible to off road vehicles and the land and wildlife are already heavily impacted by uncontrolled ORV use.	The area has been managed with a 2,000 pound limit since the Northwest Management Framework Plan was placed in effect in 1982. We have not seen evidence of any adverse effects on wildlife. The preferred alternative for the Salmon Lake-Kigluaik Mountain SRMA. Chapter II, section (B)(2)(e) "Travel Management/OHV" states that BLM may develop a future area specific plan based upon resource values and management objectives that may limit OHV use to designated trails, seasonal restrictions, closures or weight limits (Table 2-15). We believe that current use does not warrant closure of this area to OHV use at this time. Further OHV use restrictions beyond the 2,000 pound limitation will require more participation by diverse user groups within an area-specific plan which will result in better management and increase public support and cooperation between user groups.

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	78-4	Habitat destruction caused by four wheel transportation and trash and waste left in the country needs to be addressed.
117-1	Limited Off-Highway Vehicle use...For instance a project could get by with one road but people with the project could take many alternative routes and cause unneeded destruction of habitat. Restricted access is needed to protect the environment.	See response to comment # 78-4. BLM does review and restrict access under various permitted activities. Please refer to Required Operating Procedures (ROPs) in Appendix A.
117-2	This [limited access] could also restrict planes from landing in any area. Planes (bush planes) could be allowed but only in specific areas for specific reasons such as scientific research.	Currently access by plane is not causing significant damage in the Extensive Recreation Management Area and further restrictions are not warranted. In the Squirrel River, we believe that more participation by diverse user groups within a Recreation Area Management Plan (RAMP) will result in better management and increase public support and cooperation between user groups.
197-14	Pgs 2-81 to 2-85: Use of Argos or OHV with more than four wheels must be restricted or in some areas prohibited all together. This type of OHV causes considerable damage to tundra and wetland areas. Use of OHVs in critical habitat areas (ACECs, SRMAs) cannot be postponed until an activity plan is developed.	We believe that current use does not warrant closure of this area to OHV use at this time. We believe that future OHV use restrictions beyond the 2,000 pound limitation will require more participation by diverse user groups within an area-specific plan which will result in better management and increase public support and cooperation between user groups.

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<b>RENEWABLE ENERGY</b>		
52-15	Pg. 2-91 (f) Renewable Energy: With escalating energy costs, wind turbines will become a viable energy source and the plan should contemplate that possibility.	Thank you for your comment. See response to comment #130-2.
65-118	The Draft RMP/EIS did not provide an adequate discussion of the potential for renewable energy within the planning area.	Chapter III, section (C)(6) "Renewable Energy" discusses the potential for renewable energy. The discussion is limited as there has been no demand to date for these types of development on BLM land in the planning area and future demand is unknown.
130-2	We must end our dependence on dirty, finite sources of energy like coal, gas and oil and move toward a cleaner and smarter energy future based on conservation, energy efficiency, and renewable energy resources...many companies already doing so and are reaping financial rewards... Government should be supporting research and development in these areas...Government should improve fuel standards for cars...Policy movement in this direction would be beneficial to all...	The Proposed RMP/Final EIS allows for renewable energy projects such as wind. If BLM received an application for a renewable energy project within the planning area, it would be considered as discussed in Chapter II, section (B)(2)(f) "Renewable Energy" and section (B)(2)(g)(3) "Management Common to All Action Alternatives."
216-1	We can easily obtain all the gas and oil we need through conservation efforts without additional drilling. Already technology exists in hybrid vehicles which greatly reduce our demand for oil.	BLM agrees that energy conservation efforts are important but they are outside the scope of this planning effort.
<b>LANDS AND REALTY ACTIONS</b>		
4-1	All four of the Alternatives are weak on marine estuaries. They [Alaska Natives] want most privatized - not into trust lands- but into Native corporations where they will lock everybody out [referring to Native Selected lands]	Marine estuaries are usually tidal lands owned by the State of Alaska.

Letter # - Comment #	Comment	Response
	24-19	I am strongly against any land acquisitions for the Kobuk-Seward Peninsula RMP/EIS management area. I urge BLM to remove that language from the plan as it will impact water resources, fish and wildlife resources, visual resources, and areas of critical environmental concern.
24-27	The vast majority of 17(b) easements are antiquated and may have merely been tracks left over from a tractor trail and nothing else.... The trails should not be confused with historic trails because they are not. Current access is adequate for the Kobuk-Seward Peninsula and does not need enhancement by BLM.	BLM will continue to review and reserve ANCSA 17(b) easements to ensure public access to publicly owned land.
25-17	At all cost BLM should avoid right-of-way allowances as this carves up habitat, and impacts wildlife, fishing, hunting, subsistence gathering and recreation.	Thank you for your comment. See response to comment # 78-7.
31-6	So with any kinds of decisions made, especially with lands that are going to be open for sale. Which Natives can't afford. So that [land disposal] is one thing I don't want to see - lights up there in the mountains. Up there in the valley and the hills, scattered all over what they purchased. Because we opened it, because we allowed it. I don't want to see that.	Thank you for your comment. The Preferred Alternative of the Proposed RMP/Final EIS allows for land sale in very small areas in Nome and Kotzebue as discussed in Chapter II, section (B)(2)(g)(6). Lands not identified for retention could be disposed of if the disposal would serve important public objectives or if the parcel was difficult to manage. Land sales are unlikely to occur.
39-7	On the land sale, I would think Alternative C would be the best one because I feel that we should not open up the land for sale. None of us here would buy land because we don't have the money and resource to. And who would buy the land? People in California and all over the United States would move into our background. Our hunting ground.	Thank you for your comment. See response to comment # 31-6.

Letter # - Comment #	Comment	Response
46-3	The government under Alaska Native Land Claims Settlement Act gave us native allotments and hardly any of them are being patented to our native allottees.	Native Allotments are approved under the Native Allotment Act. This is an ongoing process outside the scope of this Plan.
48-5	The Native Village of Point Hope feels it should have first right to any RS 2477 if there should ever be an opportunity or an action made by the Federal government in turning over RS 2477 as a result of relinquishing them to the State of Alaska.	RS2477 is a right-of-way granted to and asserted by the State of Alaska. If the State drops the assertion or terminates the right-of-way, the subservient landowner benefits.
52-3	The transfer of the remaining State and Native selections should continue in an expeditious manner so that the land ownership pattern is clear to all interested parties.	BLM is planning to accomplish this by the end of 2009. Conveyance is an ongoing process outside of the scope of this plan.
52-4	Broad latitude must be included to allow new transportation infrastructure to be developed in the most feasible ways possible. We do not know exactly where all of the mineral and energy resources are located so we cannot predict where and what types of transportation infrastructure will be needed. The need, therefore, is to implement an infrastructure planning process that will readily accommodate future resource discoveries and allow infrastructure to be reasonably developed.	The Proposed RMP/Final EIS provides broad latitude for development of infrastructure. These types of facilities could be developed under the land laws or the mining laws. Proposals would be considered on a case-by-case basis.
58-38	These seasonal ranges [WACH calving, insect relief, migratory corridors, and winter range] should be considered ROW exclusion areas.	ROW exclusion areas are unnecessary. ROW applications would be considered on a site-specific basis and impacts minimized through NEPA analysis. All appropriate ROPs would be applied to approved projects to further reduce impacts to habitat.

Letter # - Comment #	Comment	Response
	58-71	Selected Lands and Interim Management: Since critical and seasonal caribou habitats occur on State and Native selected lands, the Working Group urges BLM to proactively manage all lands it administers, regardless of status, until they are conveyed. It is in the best interest of the WAH and their habitat if the management of selected lands favors conservative stewardship obligations. Under this scenario, selected-status lands will be minimally disturbed and remain in high quality condition until they are conveyed or retained by BLM. By taking this course of action, BLM is preserving lands it may retain after conveyances are completed.
58-77	Areas identified as migration areas [for caribou] should be designated as Right of Way exclusion areas.	Thank you for your comment. See response to comment # 58-38.
58-79	In its Proposed RMP Final EIS for the Central Yukon Planning Area (BLM 1986), the BLM cites details showing the importance of the Nulato Hills region. These lands in the Nulato Hills are on the eastern boundary and directly adjacent to the Planning Area. Since the Central Yukon Plan (CYP) prohibits permanent roads in these sensitive and critical habitats, the Working Group requests that the key wintering grounds in the Nulato Hills portion of the Planning Area be Right of Way exclusion areas; other wintering grounds in the Planning Area should be Right of Way avoidance areas. With these changes, the Working Group supports Alternative C for the Nulato Hills.	Although language prohibiting permanent roads may have been included in some alternatives of the Central Yukon Proposed RMP/Final EIS, it was not carried forward into the Record of Decision. The Central Yukon Plan does not prohibit permanent roads in the Nulato Hills. Rights-of-way are considered on a case-by-case basis. To see which decisions were implemented in the Central Yukon planning area, it is necessary to look at the Final RMP and Record of Decision for the Central Yukon Planning Area.

Letter # - Comment #	Comment	Response
64-21	<p>Pg 2-94, Land Use Authorizations, FLPMA Leases and Permits: In contrast to BLM, the State does not define trapping as a “commercially oriented activity”. Instead, trapping is only categorized as a regulated method of taking wildlife and not as a commercial or subsistence activity. Trapping includes the taking of furs for personal use, trade, and barter, as well as for sale. Therefore, it is an activity that should not be required to meet the terms of a commercial cabin use, i.e., acquisition of a lease at fair market value from the BLM under FLPMA. During deliberations concerning allowing trapping on NPS lands under ANILCA, Congress concluded that trapping is not a commercial activity unless: “. . . the trapping itself becomes a business with employees paid to support the trapping operation.” (Senate Report 96-413). We request BLM modify discussions and decisions relative to trapping to reflect this decision in the final plan, as described further in the attached letter from ADF&amp;G to the State Director of BLM.</p>	<p>BLM issues leases and permits for commercial activities. If the trapping is a substantial portion of the trapper's income, they may qualify for a lease or permit for a trapping cabin. They may harvest wildlife without using a cabin if they do not meet the income requirements.</p>
64-5	<p>In addition to the right-of-way corridors identified in ANILCA, several other possible routes were identified in the NWAP (Page 2-56, NWAP), the ability to develop prospective access corridors, especially where necessary for community and/or resource development purposes, should be considered and retained in the RMP/EIS and in implementation level planning.</p>	<p>Right-of-way corridors are designed to consolidate linear ROWs thus limiting impacts to a smaller area. Since there are no existing linear ROWs or known areas where a proliferation of ROWs are anticipated, BLM decided it was premature to designate corridors. A designated corridor is not needed to approve a ROW. Applications for ROW will be considered on a case-by-case basis throughout the planning area.</p>

Letter # - Comment #	Comment	Response
64-6	<p>Communication sites are also essential components of this remote area and should not be limited to those that currently exist, particularly for public health and safety. For example, new technologies may improve the area's communication potential with reduced ecological impacts, but may not be suited to existing sites. We suggest that new communication sites be considered on a case-by-case basis.</p>	<p>As outlined in Chapter II, section (B)(2)(g)(6) "Alternative D" communication site ROW would be considered on a case-by-case basis throughout the planning area. When feasible, sites will be co-located to avoid a proliferation of sites.</p>
64-17	<p>Page 2-82. The phrase "public landowner the easement accesses" in the first paragraph, second sentence, should be replaced by "federal agency responsible for lands accessed by the easement." By using the term "public landowner" and with the inclusion of the last sentence in that paragraph, it appears as if the State is abdicating a responsibility to manage easements accessing its lands. Enabling federal legislation and DOI policies mandate that it is BLM's responsibility to allow access across lands conveyed to a Native corporation and to administer those easements which access non-Federal lands (43 USC § 1616; 43 CFR 2650; 601 DM 4.2). The State does not generally accept management of 17(b) easements unless the trail or easement is already partly under state management (Page 2-20, NWAP).</p>	<p>43 CFR 2650 refers to the reservation of easements across lands conveyed to Native Corporations and the termination or modification of these reservations. 601 DM 4 addresses the administration of ANCSA 17(b) easements. The last sentence of 601 DM 4.2, cited in the comments states that each bureau (of the Department of the Interior) is authorized to negotiate with other Federal agencies, the State of Alaska, an Alaska borough or municipal government to transfer administration of a specific easement, if authorized by law. The offending sentence has been modified in the Proposed RMP/Final EIS.</p>



Letter # - Comment #	Comment	Response
64-18	<p>The bulleted list on Pg. 2-82, governing discretionary actions as well as demarcation of 17(b) easements, grants a priority for “[easements where landowners support the activity allowed by the easement.” Regard of this nature for the preferences of the adjacent landowner is inappropriate according to the intent and legislation governing 17(b) easements. These easements are reserved to maintain the right of access to public lands and waters and to eliminate trespass concerns. The partiality of the adjacent landowner should not take precedence when establishing priorities, especially over the access needs of the public (not listed as a specific priority).</p>	<p>Our priority is not given to "adjacent" landowner support but to the owner of the land crossed by the easement. If the landowner feels trail management is needed to reduce trespass on Native land, this would make management of the subject trail a higher priority than management of other easements.</p>
64-19	<p>The RMP/EIS states that easement acquisition impeded by allotments will be remedied “on a case-by-case basis as the need or opportunity arose, and as funds allow” and only from willing landowners. The State would appreciate that every effort be made to prevent private lands from interfering with access utilizing easements.</p>	<p>Thank you for your comment.</p>

Letter # - Comment #	Comment	Response
	64-20	<p>We request that this section [R.S. 2477 Routes, Pg. 2-82] of the RMP/EIS be adjusted to reflect new DOI policies regarding interpretation and implementation of R.S. 2477 rights of way, as outlined in Secretary Norton’s March 2006 Memorandum... also acknowledge in this section that the State additionally claims section line easements under R.S. 2477. We recommend the following language replace the first paragraph in this section: Under Revised Statute (R.S.) 2477, Congress granted a right-of-way for the construction of highways over unreserved public land. Under Alaska law, the grant could be accepted by either a positive act by the appropriate public authorities or by public use. “Highways” under state law include roads, trails, paths, and other common routes open to the public. Although R.S. 2477 was repealed in 1976, a savings clause preserved any existing R.S. 2477 right-of-way. The State of Alaska claims numerous rights-of-way across federal land under R.S. 2477, including rights-of-way identified in AS 19.30.400. Land use planning does not affect valid R.S. 2477 rights or future assertions. The validity of all R.S. 2477 rights-of-way will be determined on a case-by case basis and outside of this planning process.</p>
64-22	<p>Page 2-98, FLPMA and R&amp;PP Leases, Alternatives C and D (and elsewhere in the document): This section does not clarify whether BLM would authorize trapping cabins (as currently managed under FLPMA leases) in ACECs and RNAs. The State does not support restrictions on the use of trapping cabins on administratively designated lands.</p>	<p>Trapping cabins may be considered in ACECs on a case-by-case basis under FLPMA sec. 302 permits as discussed under Chapter II, section (g)c(3) permits.</p>

Letter # - Comment #	Comment	Response
65-7	In addition to the right-of-way corridors identified in ANILCA, several other possible routes were identified in the NWAP (Page 2-56, NWAP, attached). The ability to develop prospective access corridors, especially where necessary for community and/or resource development purposes, should be considered and retained in the RMP/EIS and in implementation level planning.	Thank you for your comment. See response to comment # 64-5.
65-72	All lands administered by BLM should proactively managed until they are conveyed. Management of selected lands should err toward conservative 'stewardship' 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.	Thank you for your comment. See response to comment # 58-71.
78-6	Land sales are of concern as most local community members do not have the resources to purchase large amounts of land and its loss to outside interests will not benefit the local community and is almost sure to be a source of future conflicts. If the BLM has lands available for disposal, maybe they should consider allotting them to veterans who have yet to obtain land under the Veteran Allotment Act.	There is no provision in the Federal laws and regulations governing land sales to limit sales to certain groups of people.

Letter # - Comment #	Comment	Response
78-7	BLM should address ROWs and transportation more specifically with regard to east-west ROWs that may be developed to transport minerals. We are concerned that these ROWs would impact caribou migration corridors. There needs to be [ROW] avoidance and exclusion areas in place to protect main caribou migration corridors.	The Proposed RMP/Final EIS allows for rights-of-ways (ROW) for various purposes. When a site-specific application for a ROW is received, it will be analyzed under NEPA and appropriate mitigation measures developed to minimize impacts. BLM will consult with ADF&G for help in developing measures to avoid disruption of caribou migration.
197-16	Pg. 2-92 to 2-96. While there is mention of Native selected and State selected lands, there is no mention of Native Allotments. Individual native allotment owners must be given the same treatment in regards to land use authorizations that may affect the allotment or the use of their allotment.	Land use authorizations generally are not issued on pending native allotments. Native allotments are considered Indian trust lands and jurisdiction on native allotments passes to the Bureau of Indian Affairs upon approval of the allotment. Certificated native allotments are private property and thus outside the scope of this plan. Native allotments are mentioned numerous times in the plan, particularly under the minerals discussion. Map 3-33 shows the location of native allotments.
<b>ANCSA D(1) WITHDRAWALS</b>		
52-2	Substantial lands within the study area have been closed to mineral entry since 1971 by the passage of ANCSA. Since that time new deposit models for mineral resources have been developed and applied to contiguous areas. Section 17(d)(1) lands should be returned to pre-(d)(1) status and opened as soon as possible.	The Proposed RMP/Final EIS recommends lifting all the ANCSA 17(d)(1) withdrawals in the planning area. Actual modification or revocation of the withdrawals will require additional action by BLM after approval of the Final RMP and Record of Decision. See response to comment #52-7.
52-7	One of the proposed implementation actions of the DRMPEIS is to revoke the 17(d)(1) withdrawals. This should be stated more clearly including an explanation of the steps required to bring this to completion and at what level in the Federal Government would this action occur.	Chapter III, section (C)(7)(c)(2) "Withdrawals" of the Proposed RMP/Final EIS describes the process. Modification or revocations of any administrative withdrawal orders including those under Section 17(d)(1) of ANCSA requires a formal action that includes Secretarial-level review and approval. The final result is a public land order signed by the Secretary of the Interior that will formally revoke or modify the 17(d)(1) withdrawal order(s).

Letter # - Comment #	Comment	Response
57-2	I oppose the provisions in Alternative D, the BLM's preferred choice, that Revoke ANCSA (d) (1) withdrawals in critical caribou habitat and open huge swaths of public lands to mineral exploration and development that were previously closed to such activities.	Thank you for your comment.
58-72	ANCSA 17(d)(1) Withdrawals: Caribou habitats will be affected if the protective status of ANCSA § 17 (d) (1) withdrawals are lifted in the Planning Area and all available acreage is open to locatable and leasable mineral entry. The Working Group supports maintaining ANCSA § 17 (d) (1) withdrawals within areas that are under consideration and/or are recommended for special management - this will afford the maximum protection for resource values.	BLM has determined that caribou habitat can be properly managed and protected without withdrawal from the mining laws.
64-1	The State is pleased to see that BLM has conducted a review of the existing withdrawals and is recommending revocation of ANCSA 17(d)(1) withdrawals; however, we do not support replacing several of these old (d)(1) withdrawals with new withdrawals. Instead we recommend alternative management tools be applied to those areas in order to meet planning objectives.	Withdrawals proposed along Boston Creek, Ungalik River, Kivalina River and Mount Osborn were not carried forward into the Preferred Alternative (D) of the Proposed RMP/Final EIS. An additional ROP FW-7 (Appendix A) have been developed to address locatable mineral development along anadromous streams. Several additional ROPs listed under SS-4 will protect lakes supporting Kigluaik Arctic char.
65-80	Current demands of multiple user groups on public resources threaten to overwhelm BLM Alaska's management workload. Should BLM proceed with its proposal to lift the (d)(1) withdrawals within the Kobuk-Seward planning area, the agency could quickly be deluged with the additional pressures of managing commercial leasable or locatable mineral development activities in pristine areas possessing critical wildlife habitat and subsistence resources.	The workload impact of lifting the 17(d)(1) withdrawals is speculative. BLM will manage any change in workload through the budgeting process.

Letter # - Comment #	Comment	Response
65-81	BLM Alaska may not have adequate financial support and staff...to handle the additional workload that would accompany such a significant change in mineral management policy. Thus, the (d)(1) withdrawals should not be lifted until the agency is allocated sufficient additional permanent funding and personnel resources.	Thank you for your comment. See response to comment # 65-80.
65-84	There is tremendous potential for conserving natural resource values on BLM-managed Kobuk-Seward lands. BLM [should] maintain (d)(1) withdrawals within the following areas...to protect valuable wildlife habitat, subsistence resources, and recreation opportunities...until the proper withdrawals or other similar protective status can be applied: 1) WACH Calving and Insect Relief Areas proposed ACEC; 2) WACH winter range, wildlife habitat, and anadromous fish habitat within the proposed Nulato Hills ACEC, Inglutalik River ACEC, Ungalik River ACEC, and Shaktoolik River ACEC; 3) Important Western Arctic Herd migration seasonal corridors (as designated by ADF&G); 4) Squirrel River's proposed SRMA...as well as other potential SRMA lands in the Buckland region and Kauk River drainage; 5) Kigluaik Mountains and the proposed Mount Osborn RNA.	If a new withdrawal is recommended, the (d)(1) withdrawals will be revoked and new withdrawals implementing the planning decisions will be issued simultaneously. However, BLM has determined that withdrawals are not necessary to protect resource values in the planning area. Federal regulations, the required operating procedures and stipulations described in Appendix A, and BLM management discretion in approval of site specific projects is sufficient to protect resource values in most areas.
198-13	BLM Should Not Continue with the Proposal to Rapidly Lift all of the Withdrawals under Section 17(d)(1) of the Alaska Native Claims Settlement Act ("ANCSA") Without Replacing Them with Adequate Protections for Their Outstanding Resource Values and Accounting for the Consequences of the Effect of Eliminating Withdrawals on Subsistence.	BLM has determined that withdrawals are not necessary to protect resource values in the planning area. Federal regulations, the required operating procedures and stipulations described in Appendix A, and BLM management discretion in approval of site specific projects is sufficient to protect resource values in most areas.

Letter # - Comment #	Comment	Response
210-1	I support the provisions in Alternative D, the BLM's preferred choice, that revoke ANCSA (d)(1) withdrawals in critical caribou habitat and open huge swaths of public lands to mineral exploration and development that were previously closed to such activities. Mining, oil, and gas ventures would not jeopardize habitat quality and will not spoil our wild lands.	Thank you for your comment.
<b>SPECIAL DESIGNATIONS</b>		
<b>ACECs and RNA</b>		
4-2	We want BLM to examine again seashore sites & areas near Kivalina, Teller, Koyuk and Unalakleet. We see at least four ACECs near these places.	BLM evaluated these four areas for possible ACEC designation. Virtually all of the coastal land in the Teller, Kivalina, and Koyuk areas has either been conveyed out of BLM ownership or is high priority State or Native selections. BLM will not retain sufficient lands in these areas to warrant ACEC designation. The small amount of land remaining under BLM ownership near Koyuk does not meet the criteria for designation. Unalakleet is outside of the Planning Area.
14-3	As a general matter, we support the creation of ACECs and RNAs because such special designations include additional protections for surface resources...In view of the surrounding state and native corporation lands, and neighboring NPRA, we see no reason for BLM to be eager to lift the withdrawal status on the lands it will retain or those included in the ACEC and RNA designations specified under the Preferred Alternative.	The ANCSA withdrawals were intended to protect resources, to prevent encumbrances that could interfere with State or Native entitlements, and to study lands for further inclusion into conservation units. In the early 1970s when the lands were withdrawn under Section 17(d)(1) and (d)(2) of ANCSA, there were few regulations to oversee the development of the public lands and protect important natural resources. Since then Congress has passed significant legislation for the orderly development of public lands and to protect the environment from adverse impacts. BLM has 1) developed oil and gas lease stipulations, required operating procedures (ROPs), and surface management regulations for mining, which are sufficient to assess and protect the resources in most situations, 2) the selection period is over and BLM is completing conveyance of State and Native entitlements, and 3) Conservation Units have been established. Many of the (d)(1) withdrawals have outlived their original purpose and are an unnecessary encumbrance on the public land records.

Letter # - Comment #	Comment	Response
15-17	Mineral leasing should be prohibited or deferred in ACECs [particularly those for the WACH] until an active adaptive management program backed by rigorous research and monitoring demonstrates that leasing in these areas can be adequately mitigated to avoid or minimize impacts to fish, wildlife and subsistence resources.	Coal leasing has been deferred in the planning area - see response to comment # 65-89 (minerals) and # 58-40 (fish and wildlife). The ACECs would be open to oil and gas leasing subject to the ROPs and Leasing Stipulations - see response to comment #58-37 (minerals).
15-18	The ACECs proposed under Alternative C in the Draft RMP/EIS should be adopted for the Preferred Alternative in the Final RMP/EIS, and the BLM should consult with the Service's Marine Mammals Management, Migratory Bird Management, and Selawik National Wildlife Refuge offices, and with the Western Arctic Caribou Herd Working Group, to determine if designation of additional ACECs may be necessary. BLM [should] work with the Service's Marine Mammals Management and Migratory Bird Management offices, and with the Selawik and Alaska Maritime National Wildlife Refuges to identify which, if any, other important habitat areas should be considered for designation as ACECs and deferred from oil, gas and other mineral leasing pending results of adaptive management research and monitoring efforts.	Other than McCarthy's Marsh and Upper Kuzitrin River, ACECs proposed in Alternative C are included in the Preferred Alternative of the Proposed RMP/Final EIS. Portions of the Kigluaik Mountains would be designated as the Mount Osborn ACEC. McCarthy's Marsh ACEC was not carried forward due to extensive conveyance of land in this area to the State in 2006. Kuzitrin River was also not reconsidered for inclusion in the Preferred Alternative. The WACH Working Group nominated several ACECs and these were evaluated. The Service's Fairbanks Field Office, Alaska Regional Office, and Selawik Refuge, and National Marine Fisheries Service were included in scoping outreach efforts and distribution of the Draft RMP/EIS but did not nominate any ACECs.



Letter # - Comment #	Comment	Response
24-20	<p>The following areas should be nominated as Areas of Critical Environmental Concern (ACEC): Benedeleben Mountains - Significant and unique geological resources, prominent summer range for caribou that summer on the Seward Peninsula, potential site for reintroduction of sheep and marmot; Darby Mountains-Significant and unique geological resources, prominent summer range for caribou that summer on the Seward Peninsula; American and Agiapuk Rivers - Very similar to Kuzitrin River it contains significant and relatively undisturbed fishery resources that contribute to the entire watersheds of the Kuzitrin, American, and Agiapuk rivers. It also holds Significant and unique archeological resources.</p>	<p>BLM evaluated these four areas for possible ACEC designation. BLM does not own any land along the American River thus ACEC designation could not occur in this area. The other three sites have some relevant values but do not meet the Importance Criteria defined under 43 CFR 1601.7-2 and were therefore not proposed for designation as ACECs.</p>
25-12	<p>The Kuzitrin River and McCarthy Marsh areas identified as ACEC in Alternative C should be included as ACEC in the Preferred Alternative D. These areas provide critical moose habitat for moose populations important to many Seward Peninsula residents. Also these areas should remain closed to reindeer grazing as long as caribou continue to winter on the Seward Peninsula.</p>	<p>See response to comment # 65-19. These areas will remain closed to reindeer grazing.</p>

Letter # - Comment #	Comment	Response
	25-14	The Kigluaik area identified as an ACEC in Alternative C should be included as an ACEC in the Preferred Alternative D. There is currently little access to this area by motorized vehicles during snow free months and the area serves as a 'refugia' for bears (many denning sites) and as a 'protected rutting area' for moose in the fall. This situation should be preserved by limiting motorized access to existing trails, if not eliminating it altogether. It would also preserve the outstanding road-accessible wilderness recreation opportunity this incredible area offers.
52-45	Pg. 3-236 (b) RNAs: Need to define RNA and the impact of such designation.	A definition of RNA can be found in the glossary and also in Chapter III, section D(1)(b)(1), "RNA's - Background." The impacts of designation on various programs are discussed in Chapter IV.
57-5	Real protection of these Areas of Critical Environmental Concern means keeping these special places closed to all forms of mineral development. It is irresponsible of BLM to recognize the important habitat values of these areas while at the same time opening these previously closed areas to mining and mineral development activities.	Many of the proposed ACECs are currently open to mineral entry. For example, most of the Nulato Hills, Ungalik River, Shaktoolik River, and Inglutalik River ACECs were opened to mineral entry in 1983 through PLO 6744 which modified the ANCSA 17(d)(1) withdrawals. Selected lands within these ACECs, which are minimal, are segregated against entry. Once conveyances are complete, segregations will be removed and the underlying open status will take precedence. Most of the underlying withdrawals in McCarthy's Marsh and Kuzitrin River ACECs were also modified in 1983. However, extensive selections in these areas keep the lands segregated against mineral entry. See maps 3-26 and 3-29 for current mineral status. See also response to comment # 68-1 (fish and wildlife).
58-75	As written in Alternative C, the proposed ACECs do not meet the Working Group expectations of habitat protection or BLM's own standards to safeguard critical resources (see BLM Manual 1613.12). The Draft RMP/EIS must reflect ACECs that meet FLPMA requirements and guidance from the BLM Manual.	As written in Alternative C, the proposed ACECs meet BLM Manual 1613.12 requirements for special management attention. Special management attention refers to management prescriptions developed during preparation of an RMP expressly to protect the relevant and important values from potential effects of actions permitted by the RMP. Under Alternative C, all proposed ACECs would be closed to fluid mineral leasing, closed to solid mineral exploration, withdrawn from mineral locatable mineral entry, closed to FLPMA and R&PP leases, designated as ROW avoidance areas, closed to grazing, and closed to disposal actions. (Appendix B)

Letter # - Comment #	Comment	Response
58-76	The multiple major pathways and convergence area of fall migration and the narrow corridor of spring migration in the vicinity of Selawik-Kobuk should be given ACEC status and provided protections that preserve and do not alter the habitat in these areas.	BLM evaluated this for ACEC designation and determined that designation is not warranted. The area meets the relevance criteria in that it supports a significant wildlife resource. However, data on caribou migration routes is not available to support the importance criteria. In fact, the limited data available seems to indicate that caribou migrate less on BLM land and more on private, National Park Service, Fish and Wildlife Service, and State land.
58-78	The Working Group supports Alternative C with modification designating winter habitat in the Nulato Hills as an ACEC in the Planning Area. Additional factors need to be considered and included in the ACEC designation.	Support for the Nulato Hills ACEC is noted. The Preferred Alternative in the Proposed RMP/Final EIS designates the Nulato Hills as an ACEC.
58-82	pg 2-105: McCarthy's Marsh is a winter habitat favored by caribou in years when they migrate to this portion of the Seward Peninsula. The Working Group supports Alternative C designating the area as an ACEC with specific restrictions.	Thank you for your comment. See response to comment # 15-18.
64-4	The State is concerned that RNA designation [Mount Osborn] may impede access to and development of these resources on both federal and state-owned lands. The State ...maintains concerns regarding justification and availability for access corridors and mineral development on administratively designated lands.	In the Proposed RMP/Final EIS the Mount Osborn area would be designated as an ACEC rather than an RNA.

Letter # - Comment #	Comment	Response
64-26	Pg. 2-106: We request BLM clarify management intent for the Mount Osborn RNA because of concerns that administrative designation under Bureau regulations may preclude the State's use of management tools for fish and wildlife, such as weirs or radio towers. We request BLM revise the final plan to state that the Mount Osborn RNA will not preclude use of various facilities necessary for state wildlife or fisheries management purposes.	In the Proposed RMP/Final EIS the Mount Osborn area would be designated as an ACEC rather than an RNA.
64-53	Pg B-4, Table B-1: We suggest that Alternative C clearly state that it pertains to the larger Kigulaik ACEC and that Alternative D pertains to the Mt. Osborne RNA (perhaps in the header row or put that specific text in bold in the first row of the table). The footnote clearly states this, as does the first row of the table, but in our initial reading of the table, we missed this distinction and others may as well.	This clarification was made in Table B-1. Although, in the Proposed RMP/Final EIS, Mount Osborn would be designated as an ACEC rather than an RNA.
65-2	ACECs are an important management tool for the BLM in the land use planning process. ...BLM [should be] prohibiting mineral development within these proposed ACECs and adopting strong protective management directives for each of the special areas.	Required operating procedures outlined in Appendix A and other management prescriptions in Chapter II provide strong protective management to these areas. See response to comments # 65-89, # 58-40, and # 58-37 (all under minerals).

Letter # - Comment #	Comment	Response
65-3	BLM's ACEC Manual explicitly recognizes mineral withdrawal as an appropriate management prescription for protecting ACEC values. BLM Manual No. 1613, Section .33.C (Provision for Special Management Attention). In general, we object to BLM's failure to include sufficiently strong management prescriptions, especially the revocation of ANCSA 17(d)(1) withdrawals, within proposed ACECs.	BLM considered mineral withdrawal of ACECs in Alternative C of the Draft RMP/EIS. Such withdrawal was not carried forward into the Preferred Alternative of the Proposed RMP/Final EIS.
65-4	We strongly support the designation of 2,893,000 acres on the Lisburne Peninsula for WACH Calving and Insect Relief Habitat as an Area of Critical Environmental Concern (ACEC), as outlined in Alternative C. ...mineral development is not an activity that is compatible with goals of conserving this sensitive caribou habitat.	Support for the ACEC is noted. The Preferred Alternative in the Proposed RMP/Final EIS designates the WACH insect relief habitat as an ACEC but does not recommend withdrawal from mineral entry or closure to mineral leasing.

Letter # - Comment #	Comment	Response
65-5	<p>According to Map 2-11... there are no placer producing areas or known mineral deposit areas within this [WACH calving/insect] proposed ACEC. And according to Map 2-9, only a very small portion of the northern and western Lisburne Peninsula possesses coal occurrences or coal fields. Therefore, we argue that there is no acceptable justification for revoking existing (d)(1) withdrawals and making these pristine lands available to locatable and leasable mineral development. The wildlife habitat and caribou populations in this area are far too fragile to endure the disruptive effects of industrialization. We request that this area is permanently closed to locatable mineral entry. We also request that the vast majority of the BLM-managed lands on the Lisburne Peninsula, excluding the locations identified on Map 2-9 as possessing coal occurrences or coal fields, are permanently closed to solid leasable mineral development. We believe that this strategy will best enable BLM to promote and protect the region's caribou habitat and subsistence resources.</p>	<p>In preparing a land use plan, BLM does not make planning decisions based on mineral values (high or low) but on multiple use and sustained yield. Portions of the Lisburne Peninsula currently have no known coal potential, and likely will not have any interest in coal exploration over the life of the plan. The Proposed RMP/Final EIS defers coal development until interest is expressed by industry. The plan does however, allow for coal exploration. The Proposed RMP also allows for locatable mineral entry subject to the ROPs. The lack of known locatable mineral potential makes development on BLM lands unlikely in this area. See also response to comment # 14-3 regarding justification for revoking ANCSA withdrawals.</p>
65-6	<p>The conclusions of the NRC, coupled with the predictions of Griffith et al. (2002) which predicted significant population-level impacts to the Porcupine Caribou Herd from industrial development within the concentrated calving grounds, gives us great concern for the future of the WACH. The potential for population-level impacts could be high, given the similarities of the size of the herds, type of projected impact, and distance of migration paths.</p>	<p>Effects of the Proposed RMP/Final EIS on caribou are covered in Chapter IV.B.3.b) pages 4-67 to 4-84. BLM does not anticipate any population level impacts to caribou from the actions allowed under the Proposed RMP/Final EIS. As discussed under the cumulative impact analysis on Chapter IV.G.2.c)(2) there could be population level impacts on the WACH under the cumulative case if industrial activity occurred within the calving grounds or crucial insect relief habitat.</p>

Letter # - Comment #	Comment	Response
65-7	<p>The ROPs and Stips only help to mitigate the worst impacts of potential mining activities, and may still allow for a significant amount of surface disturbing impacts and environmental contamination to occur within caribou habitat and watersheds of the many anadromous streams located on the Lisburne Peninsula. We believe that the threat of mining development to sensitive wildlife habitat and subsistence resources within the proposed Caribou Calving and Insect Relief Habitat ACEC is not sufficiently addressed by these measures. Therefore, we request that the Alternative C proposal for this ACEC, which would protect habitat and subsistence resources by keeping the lands closed to mineral development, is adopted in the Final RMP/EIS.</p>	<p>Support for the closure of this ACEC to mineral development is noted. See Response to comment # 65-4.</p>
65-8	<p>We support the designation of ... WACH winter habitat in Nulato Hills ACEC, as outlined in Alternative C. Mineral development is not ...compatible with the conservation of these remote caribou wintering grounds, wildlife habitat, and important anadromous rivers.</p>	<p>Support for the Nulato Hills ACEC is noted. The Preferred Alternative in the Proposed RMP/Final EIS designates the Nulato Hills as an ACEC. Required operating procedures outlined in Appendix A provide strong protective management in this area.</p>

Letter # - Comment #	Comment	Response
65-9	<p>According to Map 2-11 and 2-12 of the draft RMP, there are no placer producing areas or known mineral deposit areas within the proposed Nulato Hills ACEC, the Shaktoolik River ACEC, the Ungalik River ACEC, or the Inglutalik River ACEC. These are unencumbered lands that have not been selected for conveyance to either the State of Alaska or Native corporation. Therefore, it can be assumed that the occurrence of minerals in the Nulato Hills is low. Since development of minerals in this area will be unlikely or not economically feasible, we request that the lands remain withdrawn and closed to locatable and leasable mineral entry. Alternative C's proposed conservation measures for wildlife habitat, fisheries, and traditional uses should be the management priorities for BLM lands in the Nulato Hills and the watersheds of the Ungalik, Inglutalik, and Shaktoolik Rivers.</p>	<p>When preparing land use plans, BLM does not make planning decisions based on mineral values (high or low) but on multiple use and sustained yield. The Preferred Alternative in the Proposed RMP/Final EIS designates these areas ACECs. Required operating procedures outlined in Appendix A provide strong protective management in this area. Most of these areas were opened to locatable mineral entry through PLO 6744 in 1983. See response to comment # 57-5.</p>
65-10	<p>An ACEC management plan [for Nulato Hills] should be developed shortly upon finalization of the RMP/EIS.</p>	<p>The Proposed RMP recommends development of an ACEC management plan to include more specific measures to protect caribou and their habitat, including recommendations on fire management. The time frame for development of this plan depends upon workload and funding.</p>



Letter # - Comment #	Comment	Response
65-11	<p>The ROPs and Stips only help to mitigate the worst impacts of potential mining activities, and may still allow for a significant amount of surface disturbing impacts and environmental contamination to occur... The threat of mining development to sensitive wildlife habitat and subsistence resources within the proposed Nulato Hills, Shaktoolik River, Ungalik River, and Inglutalik River ACECs is not sufficiently addressed by these measures. Therefore, we request that the Alternative C proposal for this ACEC, which would protect habitat and subsistence resources by keeping the lands closed to mineral development, is adopted in the Final RMP/EIS.</p>	<p>The Preferred Alternative in the Proposed RMP/Final EIS designates these areas as ACECs but does not recommend withdrawal from locatable mineral entry or closure to fluid mineral leasing. These areas would be deferred from coal leasing.</p>
65-12	<p>Alternative D proposes to develop an ACEC management plan with the intention of protecting caribou and caribou habitat, a definitive fire management plan would not be implemented. Instead, the ACEC management plan would include "recommendations on fire management to protect lichen habitats from fire". Draft RMP/EIS at 2-107. Prescribing "recommendations" does not carry the weight of a fully-devised and implemented management plan. Therefore, it is incumbent upon BLM to develop specific outlines for fire management, as outlined in Alternative C.</p>	<p>The wording in this section has been revised for clarification. The intent in Alternative D is to develop a more encompassing plan that would include both fire management and additional stipulations on other activities to protect caribou habitat. In Alternative C, the plan would focus on fire management since the ACEC would be closed to many other types of land uses.</p>

Letter # - Comment #	Comment	Response
65-13	<p>[If] BLM chooses to implement the recommendations above, it would remain consistent with the land it administers directly east and adjacent to the Nulato Hills wintering grounds in the Central Yukon Planning Area. In fact, the BLM found the Nulato Hills region to be of such importance that it proposed several ACECs were designated in its RMP Final EIS for the Central Yukon Planning Area (BLM 1986). Critical and sensitive habitats located in the Central Yukon Planning Area were deemed so important, that the Final Plan prohibited permanent roads. It would be consistent with this plan, developed in 1986, for the current plan to consider designating this key migratory path for the WACH as a Right of Way exclusion area and peripheral wintering grounds as a Right of Way avoidance area.</p>	<p>The Central Yukon Plan does not prohibit roads in the Nulato Hills. See response to comment # 58-79.</p>
65-14	<p>We support the designation of the proposed 84,000 acre Mount Osborn Research Natural Area (RNA). Approximately 50 glacially-formed cirque lakes in the Kigluaik Mountains support populations of reproductively isolated fish species. These genetically unique Arctic char populations have been identified by BLM as a sensitive species and warrant protection, as well as targeted scientific research. Additionally, the unique geology of the area provides habitat for rare plant species and gyrfalcons, highly metamorphosed rocks, and small mountain glaciers and moraines.</p>	<p>In the Proposed RMP/Final EIS, 82,000 acres in this area would be designated as an ACEC rather than an RNA. Additional Required operating procedures were developed to protect Kigluaik char habitat (Appendix A, section B(4) "Special Status Species"). BLM will take additional management actions to protect sensitive species. See response to comments # 65-67 and # 65-68 (fish and wildlife) regarding management of arctic char.</p>

Letter # - Comment #	Comment	Response
65-15	<p>The Kigluaik Mountains are an extremely fragile environment, and the use of motorized vehicles during the snow-free months causes severe scarring and damage to the terrain. Wildlife habitat for moose and bears is also be negatively impacted by the presence of off-highway vehicles. Only foot trail access should be allowed in the Mount Osborn RNA. Therefore, we are opposed to the 'semi-primitive motorized" proposal for the Kigluaik Mountains, as presented in both Alternatives C and D. Since this area is relatively close to Nome, we request that physical barriers are constructed to prevent motorized access [and] adequate law enforcement presence is allocated.</p>	<p>The semi-primitive motorized designation is necessary because snowmachine use occurs in the Kigluaik Mountains during the winter. Much of this use is associated with subsistence hunting. If it was classified as primitive or primitive non-motorized, use of snowmachines would be prohibited. Given the size of the area and the number of possible access points, physical barriers would likely not be very effective. See also response to comments # 25-10 (Recreation) and # 67-1 (Recreation).</p>
65-16	<p>We support the Alternative D recommendation to permanently close the proposed Mount Osborn RNA to locatable mineral entry. Eliminating the opportunity for mineral development to occur in this area will provide BLM with a strong management tool for protecting the unique ... values for which the area is being recognized through RNA designation.</p>	<p>In the Proposed RMP/Final EIS, Mount Osborn would be designated as an ACEC rather than an RNA. See response to comment # 65-14.</p>
65-17	<p>Many of the lands in this area [Mount Osborn RNA] are high priority selections for the State of Alaska. We request that interim protective management and prohibition of motorized vehicle use is allocated to these lands upon completion of the Final RMP/EIS, as would be assigned when designation occurs.</p>	<p>Actually, most of the high priority State selections are outside of the RNA boundary as proposed in the Draft RMP/EIS. In the Proposed RMP, the Mount Osborn ACEC would be designated. Interim management is outlined in Appendix B "ACEC comparison tables".</p>

Letter # - Comment #	Comment	Response
65-18	If any adjacent lands within Alternative C's proposed Kigluaik Mountains ACEC are retained in permanent BLM management, we request that they are also added to the Mount Osborn RNA, afforded the same protective management, and closed to motorized vehicles.	In the Proposed RMP/Final EIS, 82,000 acres in the Kigluaik Mountains would be designated as the Mount Osborn ACEC. The boundary of the ACEC was developed to include important habitats for Kigluaik arctic char and has been adjusted to reflect current land ownership and selection priorities (Map 2-21).
65-19	We request that the Final Kobuk-Seward RMP/EIS adopt a long-term management scenario in which the state-selected lands within the (Alternative C) proposed McCarthy's Marsh and Upper Kuzitrin River ACECs would be re-considered for ACEC designation if sufficient acreages of these lands are retained in permanent BLM management.	Based on conveyances to the State in 2006, McCarthy's Marsh ACEC was not carried forward into the Proposed RMP. Kuzitrin River was also not reconsidered for inclusion in the Preferred Alternative of the Proposed RMP.
65-20	McCarthy's Marsh ACEC should be a Right of Way exclusion area to protect caribou movement corridors. These lands are also important traditional subsistence use areas for residents of the Seward Peninsula	Much of McCarthy's Marsh was conveyed to the State in 2006. See also response to comment # 58-38 regarding right-of-way exclusion areas.
65-73	All proposed ACECs, RNA's, and SRMAs, should include selected lands within their boundaries. This will prevent management and enforcement problems when, and if, land ownership changes in the planning area.	These areas do include selected lands within their boundaries. These lands will be managed as specified in the Final RMP until they are conveyed. Lands retained in Federal ownership will remain part of the special area and will continue to be managed as specified in the RMP. Selected lands will not be encumbered by designation and if conveyed to the State or Native Corporations, management prescriptions will not remain attached to the land.

Letter # - Comment #	Comment	Response
65-76	Ungalik Watershed ACEC: The RMP/DEIS notes that “placer mining could still occur on State managed lands within navigable portions of the riverbed itself.” <i>Id.</i> Obviously, this activity on State-owned lands would have an impact on the adjacent Federally-managed lands. BLM should further acknowledge this uncertainty as to impacts and plan accordingly... to minimize the outside impact on lands that will remain in Federal ownership.	Placer lodes within the State of Alaska have been identified and viable lodes have been/are being developed. The probability of development within the Ungalik ACEC is unlikely. If indeed placer mining were to be proposed within the navigable portion of the Ungalik River within the Ungalik ACEC, BLM would address that action through the NEPA process to mitigate effects on BLM-managed land.
65-86	We support the Alternative C proposal to keep unencumbered caribou habitat within the proposed Calving/Insect Relief ACEC and Nulato Hills Winter Range ACEC closed to fluid leasable minerals development, as depicted on Map 2-7 of the draft RMP.	Thank you for your comment. Support for closure to fluid mineral leasing is noted.
65-124	We strongly support the ACEC proposals for critical habitat of the Western Arctic Caribou Herd. However, we are very concerned about the weak management prescriptions applied to the sensitive habitat, specifically the proposals to revoke ANCSA 17(d)(1) withdrawals and open the lands to mineral development.	Support for ACEC designation of WACH habitats is noted. See response to comments # 14-3.
67-2	I support identifying the Kuzitrin River and McCarthy Marsh areas as ACEC. These areas provide critical moose habitat for moose populations that are important to Seward Peninsula residents of Nome, White Mountain, Golovin, Elim, Teller and other AK residents.	Thank you for your comment. See response to comment # 65-19

Letter # - Comment #	Comment	Response
	67-6	The Kigluaik Mountains should be identified as an ACEC... The Kigluaik Mountains are in close proximity to Nome and are used by Nome residents who enjoy backpacking and recreating in a remote and unspoiled environment. This area is a hiking paradise and trails are completely unnecessary for access or navigation. Naturally occurring rock and scree fields protect the heart of the area from access by four wheelers, thus the upper drainages provide a refuge for moose during the rut, the mountains are an important denning area for bears and the alpine lakes contain a genetically unique subspecies of char.
116-5	If State-selected lands are retained in permanent BLM management, we support ACEC designation for McCarthy's Marsh and Upper Kuzitrin River, for conservation of caribou, moose, anadromous fish, and waterfowl habitat.	Thank you for your comment. See response to comment # 14-18.
197-10	The ACEC in Nulato Hills must include the southern portion of the Nulato Hills for wintering area of WACH as the herd has been wintering further south in recent years, near and east of Shaktoolik.	The southern portion of the Nulato Hills is part of several ACECs as shown on Map 2-21
197-24	The proposed ACECs do not provide meaningful protection for the caribou calving, insect relief, and winter critical habitat areas.	Thank you for your opinion, it was considered when crafting the final preferred alternative in the Proposed RMP/Final EIS.
197-15	Pg. 2-81 to 2-85. Implementation decisions that apply to other areas in Alternative C must apply to Nulato Hills ACEC and calving/insect relief ACEC as our preferred alternative, rather than Alternative D.	We believe the commenter is referring to Tables 2-13 and 2-14 of the Draft RMP - Travel Management Areas. The current level of OHV use in the Nulato Hills and Insect Relief ACECs do not warrant more specific travel management decisions at this time. The RMP does allow for development of more specific OHV limits in the future if necessary.

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210-2	I do not support the proposed ACEC designations in Alternative C because they do not accord any real protection for anything. It is the job of the BLM to recognize the important habitat values of these areas while at the same time opening these previously closed areas to mining and mineral development activities.	Alternative C is not BLM's preferred alternative.
<b>GENERAL SPECIAL DESIGNATIONS</b>		
18-2	I am hoping that, that the Koyuk country, which when I say Koyuk country would be the headwaters of the Koyuk River, the Granite Mountain area on down, the East Fork headwaters, the Inglutalik headwaters and Ungalik River headwaters, including their basins. I'm hoping that ...there could be a special designation mainly because this has been the pristine country and it is one of the last pristine countries left in the world.	The headwaters of the Inglutalik and Ungalik rivers are both proposed ACECs in the Preferred Alternative. The Koyuk River area will be managed to maintain healthy fish and wildlife populations. Activities permitted by BLM will be subject to the required operating procedures. Recreation management decisions provide a basis for limiting commercial activities in this area if conflicts arise - see response to comment # 75-2.
52-6	Additional special restrictive designations of RNAs, ACECs, wild & scenic rivers, etc. are not appropriate. Massive areas in this part of Alaska are already in congressionally designated parks, preserves, monuments, refuges, etc.	Under FLPMA and BLM Planning Guidance, BLM is required to consider special designations during the planning process. Chapter II outlines which types of designations are considered under the various alternatives.
65-74	If ACECs and SRMAs only encompass unencumbered BLM lands; what will happen to adjacent lands that are selected and excluded, but ultimately retained in federal ownership?	ACECs and SRMAs do not only encompass unencumbered lands. Most include some selected land. Special Area boundaries in the Draft RMP were based on watersheds, current BLM land ownership, selection priorities, and location of the relevant values. Lands outside of boundaries identified in the Final RMP that are retained in Federal ownership would not be part of the ACEC or SRMA. Several of the special area boundaries were adjusted in the Preferred Alternative of the Proposed RMP to reflect updated State-selections and conveyance that occurred in 2006.

Letter # - Comment #	Comment	Response
	65-75	When land conveyances are completed within the Kobuk-Seward planning area, BLM [should] conduct an inventory of all lands remaining under BLM management to identify those that are near or adjacent to designated ACECs, RNAs, or SRMAs. These lands should then be incorporated into the recognized areas in order to expand the positive benefits of special management attention.
<b>WILD AND SCENIC RIVERS</b>		
14-2	We support Alternative C in its designation of a number of rivers as "wild" under the WSRA. We believe such designations can lead to expanded quiet recreational opportunities. We are puzzled however, as to how BLM is meeting its obligations under this act [WSRA] when the Preferred Alternative summarily states that no rivers pass the test of "suitability". No analysis showing how each river was determined not to be suitable is included in the Draft.	The Bureau is required to consider potential wild and scenic rivers in planning, and we are doing this by considering a range of alternatives showing the impacts on river values under designation and non-designation scenarios. In the preferred alternative we are looking at the impacts of a scenario where no rivers in the planning area would become part of the national wild and scenic rivers system. The suitability decision will be made in the record of decision.
25-15	Include the Agiapuk River as a river suitable for Wild and Scenic Designation if this is the only way to protect the unique wildlife resources of this drainage, upon which there is significant subsistence reliance for moose, fish and berries. The Agiapuk River drainage supports the healthiest moose population on the Seward Peninsula (consistently highest calf:cow and bull:cow ratios) and preservation of the habitat in this area is critical to maintaining this important subsistence resource. If protection of the drainage and its high quality moose habitat can be accomplished without Wild and Scenic designation, this is an acceptable alternative.	This comment casts a vote for designation, and poses moose habitat as an outstandingly remarkable value. After reviewing with the planning team, we added this value to Table 3-36.



Letter # - Comment #	Comment	Response
25-16	Include the Fish River as a river suitable for Wild and Scenic Designation if this is the only way to protect the unique wildlife resources of this drainage. This river system is an important subsistence area which supports a wide variety of fish and wildlife resources utilized by a large cross section of Seward Peninsula residents from Nome and nearby villages. If protection of the wildlife and subsistence resources associated with the Fish River can be accomplished without Wild and Scenic designation, this would be acceptable.	This comment casts a vote for designation.
26-6	The Agiapuk is a very rich stream and I encourage you to keep wild and scenic classification there.	Thank you for your comment. See response to comment # 25-15.
57-4	Although I am not familiar with all eleven rivers that are eligible for Wild and Scenic River designation, it is hard to believe that none of them are worthy of recommendation for this designation and so I request that BLM revisit that decision in the final plan.	Thank you for your comment. See response to comment # 14-2.
64-2	The Wild and Scenic River assessment done for the Kobuk Seward plan must consider the fractionalized ownership pattern of BLM lands. Because of the fragmented land ownership patterns in the area, it is unlikely that any rivers in the planning area are suitable for Wild and Scenic River designation. In addition, the State as an upland land manager and the manager of navigable water bodies is unlikely to support additional designations. Adequate protection of Alaskan lands and waters is not dependent on additional Congressional conservation designations	We have carefully considered the professional opinions expressed, and agree that land ownership patterns, and lack of State support for designation affect the suitability of rivers in the planning unit as potential additions to the national Wild and Scenic River system. However, these factors alone are not sufficient to make a suitability determination. See response to comment # 65-51.

Letter # - Comment #	Comment	Response
	64-28	Page 2-115, Table 2-18 Wild and Scenic Rivers – Summary of Alternatives: Clarify that for “Free-flowing rivers” (Alternative C), prohibitions on dams and significant diversions are only applicable to unencumbered BLM-owned lands. The State also requests that such prohibitions be considered on a case-by-case basis and, when on uplands adjacent to navigable waterways, in consultation with the State.
64-40	Pg. 3-243 (d) Suitability: Please review the first sentence and consider editing the phrase “within the planning area as...” We wish to reiterate the fact that there is a clear lack of State support for further Wild and Scenic River designations within this planning area.	We added a sentence to the end of the paragraph to capture the information in this comment.
64-48	Pg. 4-157 (10) Impacts to Recreation from Special Designations: It is unclear why the RMP/EIS states that future planning and study will attempt to identify rivers to be added to the Wild and Scenic River System. Please note previous comments made regarding the State’s position on future designations.	We deleted this sentence. BLM is obligated to consider potential WSRs in any planning effort, but the sentence we deleted was confusing.
64-52	Pg. 4-167, Alternative C (7): It is unclear why the RMP/EIS states that future planning and study will attempt to identify rivers to be added to the Wild and Scenic River System. (Similar language on page 4-157)	See response to comment # 64-48. We deleted the sentence.
65-32	An additional management tactic that we urge BLM to adopt in the final RMP is the continuance of protection for Squirrel River’s outstandingly remarkable values, free flowing nature, and pristine water quality, as currently ensured by its Wild and Scenic Study River status	The decision on Wild and Scenic River designation for the Squirrel River is with Congress. It is true that certain protections as a study river will soon expire should Congress not act, and BLM is considering a range of actions to protect river values without designation.

Letter # - Comment #	Comment	Response
65-40	We recommend that BLM adopt a watershed-based approach to managing the outstanding and remarkable resources of these rivers, especially the Ungalik, Agiapuk, Squirrel, Kivalina, and Fish Rivers.	To the extent practicable, BLM does use a watershed-based approach to management of these (and other) rivers.
65-41	On pages 3-245 and 4-180 of the draft RMP/EIS, BLM lists eleven eligible rivers and their outstandingly remarkable values (ORVs). The draft RMP/EIS does not, however provide any detailed description of the ORVs relevant to each eligible river. This is not adequate to constitute a 'careful documentation' of all of the applicable ORVs for each river. A more detailed description of the specific ORVs for each river must be provided.	The plan was prepared with the information available, and we are considering the effects of various management options on potential wild and scenic rivers, as required by the WSRA. Throughout scoping, and now with the draft plan, we have solicited comments on ORVs, and the information we have is included in the various sections of Chapter III. We've taken a liberal approach to deciding if a river value is outstanding to allow for the limited information we have at hand.
65-42	Further, documentation of the values of a particular river segment is necessary to ensure that those values are protected until a final suitability determination is made. The BLM Manual 8351 § .33c requires that "As long as a river segment is under study it must be afforded protection at the tentative classification level it was given when determined eligible, even if another classification is considered as an alternative in the RMP." This requires protection of the values for which the river was found eligible. Without detailed descriptions of those river values, it is impossible to determine whether adequate protection is provided for the eligible rivers.	We have considered the professional disagreement expressed in this comment, and believe that we can protect fisheries, wildlife, scenery, etc. without extensive or detailed information covering hundreds of miles of stream and hundreds of thousands of acres of land along these streams. Nor do we believe this is required by law or policy. When there is a specific action proposed we take a closer look prior to authorizing the proposed use. Some actions are clearly out of place in a stream under protective management, for example, dam building. Once a river becomes part of the national system a detailed plan is developed to protect values for which it was designated, and developing such plans for streams that are not at risk prior to designation would not be in the public interest.

Letter # - Comment #	Comment	Response
65-44	<p>Although the draft RMP/EIS indicates that the eleven eligible rivers “will be managed—to the extent possible using BLM discretionary authority—to protect the outstandingly remarkable values identified in the table until a final” suitability decision is made, it does not provide specific information regarding the proposed management plan. RMP/DEIS at 4-181. According to BLM Manual 8351, 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 public and release of the draft RMP.”</p>	<p>We have considered the professional disagreement expressed in this comment, and disagree with the interpretation of BLM 8351. WO IM 2004-196 clarifies protective management from the time a stream is found eligible to the time a suitability determination is made: "BLM's policy is to protect any ORVs identified in the eligibility determination process to assure a decision on suitability can be made. The Bureau has broad discretionary authority to not impact rivers values or make decisions which might lead to a determination of eligibility. It is BLM's policy to manage and protect the free-flowing character, tentative classification, and identified ORVs of eligible rivers according to the decisions in the associated Resource Management Plan. This protection occurs at the point of eligibility determination, so as not to adversely constrain the suitability assessment or subsequent recommendation to Congress. BLM may protect river values using both NEPA and FLPMA. Wild and Scenic River issues involving NEPA supplementation are the same as for other resource values. When BLM considers a proposal that could constitute a major Federal action that significantly affects the quality of the human environment, the Council on Environmental Quality regulations require NEPA compliance before BLM can act on the proposal (40 CFR 1506.I). Eligible river segments determined to be nonsuitable through a land use plan decision are subject to the direction and management decisions contained in the land use plan." The Final EIS will identify the eligible rivers to be placed in protective management. One of the outcomes of this land use plan will be suitability determinations on all eligible rivers in the planning area. We added a sentence to the WSR discussion in Chapter III to tentatively classify the eligible rivers for management as wild river areas.</p>
65-45	<p>The draft RMP/EIS does not indicate how these values [ORV] will be protected throughout the planning process...It provides little description of how these values will be protected pending a final suitability determination. Alternatives A, B, and D in part depend on ROPs and stipulations to protect these rivers. RMP/DEIS at 4-63...The ROPs do not specifically discuss the individual rivers, or how they would provide protection for the outstandingly remarkable values for each of those rivers. RMP/DEIS Appendix. A. Without further explanation, this is inadequate to effectively protect the values of each river segment.</p>	<p>Thank you for your comment. See response to comment # 65-44.</p>

Letter # - Comment #	Comment	Response
65-46	We contest that BLM acted arbitrarily and capriciously under NEPA in finding that all rivers are suitable under one alternative and that no rivers are suitable based on the same factors under another alternative. All of the rivers are potentially suitable, and a reasonable range of alternatives would arguably include alternatives that find some portion of the rivers suitable as well.	The alternatives do not constitute a "finding" regarding suitability of rivers as worthy additions to the national Wild and Scenic Rivers system. Rather, the alternatives provide a framework for analyzing the impacts, both positive and negative, to the human environment, of designating certain rivers. Designation is a congressional prerogative. Determination of suitability, the authority for which has been delegated to BLM State Directors, will be one of the outcomes of this planning process, and will be documented in the Record of Decision. It may be arguable that we could have developed an alternative with two or three rivers managed as components of the national system, but such an alternative is not required for a substantive consideration of the effects of designation, nor for a reasoned and fair decision on suitability as an outcome of the planning process.
65-47	The Ungalik River stands out as unique and worthy of permanent protection. The land status along this river is not encumbered by Native or State selections, and therefore offers BLM an opportunity to ensure long-term management and recognition under the National Wild and Scenic Rivers System. The river's headwaters have already been designated as an ACEC within the Central Yukon RMP for the protection of fish habitat. We request that BLM adopt the Alternative C finding that the Ungalik River is suitable for Wild and Scenic River designation, and expand the recommendation to include the river's adjacent, unencumbered headwaters for a comprehensive, watershed-based designation proposal.	This is a reasonable comment, and if the Ungalik is found to be suitable in the record of decision, the Bureau will look at inclusion of the headwaters in any legislative package prepared as a result.
65-48	Support for rivers identified as suitable in Alternative C: Fish River-This essential river supports a wide variety of fish and wildlife resources utilized by the Seward Peninsula's local subsistence users.	We note this opinion concerning the suitability of the Fish River as a potential Wild and Scenic River.

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65-49	Ipewik & Kupik Rivers: Unique, critical nesting habitat for raptors is found along these rivers as well as a high occupancy of nesting sites, which thereby warrants protection under the Wild and Scenic Rivers Act.	We note this opinion concerning the suitability of the Ipewik and Kukpik as potential Wild and Scenic Rivers.
65-50	Support for rivers identified as suitable in Alternative C: Providing exceptional wildlife habitat and subsistence resources, the Agiapuk River supports the healthiest moose population on the Seward Peninsula and preservation of this habitat is critical to maintaining subsistence resources upon which local residents rely.	We note this opinion concerning the suitability of the Agiapuk River. See response to comment # 25-16.
65-51	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 that time will the ownership status of the eligible rivers be fully known and the corresponding management challenges, if any, best understood. If eligible river values are managed in accordance with their tentative classifications, as required under BLM Manual 8351, the river status and eligibility will not be diminished in the interim.	We note this recommendation, the professional disagreement expressed with the direction taken by the planning team. However, after careful consideration we believe that ownership considerations are not going to make or break suitability determinations, and that it is in the public interest to make suitability decisions in the record of decision. We note that no significant impacts to river values are identified for eligible rivers under any of the alternatives.

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65-52	<p>In the Final Kobuk-Seward RMP/EIS, BLM should follow suit with the Final East Alaska RMP/EIS decision to (a) defer the suitability determination for eligible rivers until ANCSA and State entitlements are met, (b) provide strong interim management of eligible river corridors, including prohibition of mineral exploration and development, and (c) commit to conduct a future valid suitability assessment of all eligible rivers that are retained under permanent BLM management.</p>	<p>Thank you for your comment. See response to comment # 65-51.</p>
66-1	<p>While it is appropriate to have "wild and scenic" designations for some river systems and especially those on the southern Seward Peninsula, this designation would not be useful because the spawning salmon habitats are generally within Native Allotments, which are not affected...Land ownership and subsequent regulations, would become more convoluted for local users, leading to confusion and possible non-compliance. It is important to balance the conservation of the resource with the realities of access, land ownership and regulation changes, as well as subsistence needs of local users.</p>	<p>We note the opinions expressed concerning the impacts of wild and scenic designation on local users and on river values. We agree that it is important to balance the conservation of the resources with other aspects of the human environment.</p>
67-3	<p>(Pg 2-115) Identify the Agiapuk River as a river suitable for Wild and Scenic designation. The Agiapuk River supports the healthiest moose population on the Seward Peninsula with consistently the high calf:cow and bull:cow ratios. Preservation of the habitat in this area is crucial to maintaining this important subsistence resource.</p>	<p>Thank you for your comment. See response to comment # 25-16.</p>

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	67-4	Identify the Fish River as a river suitable for Wild and Scenic designation. This river system is an important subsistence area which supports a wide variety of fish and wildlife resources utilized by a large cross section of Seward Peninsula residents from Nome and nearby villages.
116-3	We support wild and scenic river designation of the eligible Ungalik River and Kivalina River. The Ungalik River is located within critical winter range for caribou, and the fisheries for Pacific salmon and resident species are outstandingly rich. The Kivalina River also possesses an exceptional salmon fishery and is noted for its important and rare spawning and rearing habitat for Dolly Varden. Recreational and sportsman opportunities are virtually unlimited along both rivers... inclusion in the WSR system would ensure the strongest protections available...	As noted by the commenters, the Ungalik and Kivalina Rivers are shown in Chapter III as eligible. Chapter IV describes the impacts to the basic river values of free-flowing unpolluted waters and the outstandingly remarkable value of fisheries in these rivers under scenarios where these river would be managed as components of the national wild and scenic rivers system, or not. We note that the commenters believe these rivers are suitable for designation.
117-4	The WSRA has not been used to my knowledge in this area. The designated or recommended rivers need to be classified as WSRA. These areas cannot be re-created and need to be protected for future generations.	This comment has been noted.
198-12	There is substantial uncertainty regarding which river areas will remain in federal ownership and which will be conveyed to the State and/or Native entities. Making final non-suitability decisions in the face of such uncertainty, could mean that an eligible river's values would be permanently removed from the possibility of protection under the WSRA. Therefore, we submit that it is premature and inappropriate to make final suitability decisions and recommendations within this RMP.	Thank you for your comment. See response to comment # 65-51.



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<b>SOCIAL AND ECONOMIC</b>		
25-2	But there is a huge, sociological problem out there. Social problem which it is genuinely and legitimately feared could come to violence, and blows and death. There have been conflicts in the past so any actions BLM can take are highly advisable. What needs to be regulated and limited is the number of clients that are going into this area.	We are addressing this issue through development of a Recreation Area Management Plan for the Squirrel River. Various tools for managing recreational use and visitor use levels will be considered during development of the RAMP.
48-4	In dealing with mining opportunities and development opportunities...We do not have any opportunities for participating in any mining activities at this point.	Thank you for your comment. See response to comment # 102-1
52-17	Pg. 2-142. Summary and Comparison Tables: "Up to 50 new jobs may be created ...." Mining as an industry has a high local hire rate. Examples include Red Dog, Rock Creek, Donlin, and Pebble. The sentence starting "Although the benefit on the local economy..." this is not correct. New mines will have a tremendous impact on the local area and, depending on the size, will have a large statewide impact. Even smaller placer mines often hire local residents and this must be taken into account.	We agree that mining has a positive economic impact on State and local economies. The EIS attempts to put into perspective the level of development given the state of resource knowledge where BLM-managed land is the topic. None of the mines mentioned in the comment are on BLM-managed land. It seems the land was selected and conveyed because the resource was well know. This is the case and basis for land selection made by the State of Alaska and by ANCSA Native corporations.
52-57	Pg. 4-25 (2) Social and Economic Conditions: Out migration is largely due to the lack of good jobs. Expanded resource development, if it occurs, could help provide high-paying, long-term, year-around jobs and help prevent further out migration.	Reasons for migration are complex. During most of the 20th century, rural Americans moved to cities to capture opportunities...jobs and other perceived benefits. It could be that rural Alaskans are following a similar pattern. For example, the Red Dog Mine employs NANA shareholders...but most of them have moved out of the bush. This is a consequence of have a good job and money to spend...

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	52-62	Pg. 4-221 3" paragraph: The paragraph beginning "In 2000, revenues..." contains interesting information but how is it relevant? If the information is included, the same year should be used for the comparison between the NSB, State, and Federal revenues.
65-82	BLM should analyze the long-term potential economic benefits of lifting (d)(1) withdrawals in the Kobuk-Seward region and include these findings in the Final RMP/EIS.	The impact analysis under Alternatives B and D assumes the revocation of (d)(1) withdrawals and impacts are assessed, based on reasonably foreseeable development over the life of the plan.
69-2	[R]eindeer herders, who are also subsistence hunters and fishermen, have provided as substantial economic impact to their communities monetarily and through distribution of a healthy red meat...we would like to continue reindeer herding	The preferred alternative carries on grazing at the same level active herding occurs now.
77-1	[I] have yet to see public lands mined to the financial benefit of its owners, we the people. When will BLM begin to treat land use by mining companies and others as a well published business plan to the benefit of the people owners which involves a time-limited commercial lease, resource fees, clean up and reclamation and present this to the people land owners as a business plan to vote on?	Mineral development is subject to regulations under 43 CFR 3809, which provides resource protection. Additional environmental analysis will be necessary for site-specific development. The NEPA process will afford the public input.
102-1	The jobs resource development brings does not hire local Alaskans or train local Alaskans to qualify for the jobs.	Corporations in the tourism, seafood, oil and gas, and mining industries in Alaska currently hire and train Alaskan residents...with mixed results. Red Dog Mine is a good example of local hire.
130-6	The Kobuk-Seward Peninsula should be protected from resource development because the potential resources or economic gain is not sufficient to out weigh harm to the environment.	The tradeoff between short-term benefits and long-term productivity are considered in Chapter IV, section (J) "Short-Term uses vs. Long-term Productivity."

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201-1	It is critical at this time to open the lands to mineral entry, to open the door for economic development.	Most of the planning area will be open to both locatable and leasable mineral entry under the Proposed RMP/Final EIS.
<b>HAZARDOUS MATERIALS</b>		
1-11	Prescribed burning releases mercury and fine particulate matter into the air causing air pollution and that fine particulate matter causes lung cancer, heart attacks, strokes, asthma, pneumonia and allergies.	Neither prescribed fire nor wildfire release mercury as they burn. The only way mercury could be released by fire is if a mercury contaminated site burned. We know of no such site(s) in the planning area. Prescribed fire does release particulates into the air, however we know of no data that links prescribed fire as the cause of pulmonary, respiratory or allergic conditions or disease. While people with asthma or allergies may be affected by prescribed fire, healthy individuals should not be affected. Before any prescribed fire is implemented smoke management is thoroughly addressed in a burn plan.
52-48	Pg. 3-251 (1) Potential Sources of Hazardous Materials: "There are 14 known contaminated sites ..." There are many more sites than this shown on Map 3-36. We assume the remainder are not administered by BLM's Hazardous Materials Program.	The assumption is correct. The list of sites from available data sources is plotted on the map along with the generalized land status. The 14 sites mentioned are on BLM-administered lands.
52-49	The second sentence under (1) Potential Sources "Most sites are or were related to... mining..." This statement is not supported by the map where only three mining sites are marked and at least one of these, Big Harrah, is not abandoned. If this entire line of reasoning is not removed, at the very least the word "most" should be changed to "some".	Most sites that affect BLM-administered lands where a potential responsible party, such as the Department of Defense, is not present or does not exist are associated directly and indirectly with mining related activities.
52-50	The majority of Hazardous Materials Sites in the region are related to military activity. With only 14 sites it should be a simple matter to list them and spell out the contamination for each.	Thank you for your comment. More detailed information on the 14 sites on BLM land is available from the Fairbanks District Office and Anchorage Field Office.

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52-51	Pg. 3-252 Table 3-37: we suggest that cyanide be replaced by mercury as it was more widely used historically by mines in the planning area for recovery of gold. Also, cyanide converts to carbon and nitrogen very readily unless extraordinary management effort is expended to maintain pH. If cyanide was used it would have broken down naturally after a few weeks, let alone the decades that have elapsed. Mercury can and does persist in the environment in its metallic form and can react to produce toxic organic forms of mercury such as methyl mercury. See <a href="http://www.epa.gov/mercury/index.htm">www.epa.gov/mercury/index .htm</a> for more info.	The comment is noted and the contaminant has been added to Table 3-37.
52-52	Pg. 3-253: Table 3-38 purports to list potential effects and risks. This is tremendous overkill and totally unnecessary when considering the size of the potential problem... This table should be dropped.	The potential affects and risks table (Table 3-38) is related to the inter-relationship of contaminated media and potential impacts.
<b>ENVIRONMENTAL JUSTICE</b>		
65-39	If nonlocal hunters are given unlimited access to the wildlife and fish resources in the planning area, to the detriment of local use of the same resources, then the plan has had a disproportionate effect on the local community. BLM should evaluate possible effects on the local communities' use of resources not only for compliance with ANILCA, but also as part of its mandate to consider environmental justice.	In the East Alaska RMP we evaluated the effect of total loss of subsistence hunting areas under an alternative proposing complete transfer of the TransAlaska Pipeline Utility Corridor. This indicated effects on all hunters holding Federal subsistence permits, as key areas would be unavailable. In the Kobuk/Seward Peninsula Planning area local residents are not losing Federal subsistence permits, or hunting area. They, in fact should have a continued advantage over non-local hunters. If the game populations fall to a level of concern for subsistence, the ADF&G and the State Game Board will correspondingly limit general hunting. That said, we are not at a point where there would be disproportionate local <i>economic</i> effects.

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<b>SUBSISTENCE</b>		
5-1	I would like to comment on the importance of subsistence, especially the Western Arctic Caribou Herd and then also the harvesting of timber for firewood and/or for building purposes be allowed in some areas along the rivers. And the biggest concern we have is protecting our subsistence and access to those subsistence resources be it caribou, or fish, or moose.	BLM recognizes the importance of the Western Arctic Caribou Herd in terms of both its wildlife value and as a subsistence resource. The use collection of small amounts of dead and down wood for campfires or similar personal use is allowed on BLM lands. Harvesting larger amounts of live, or dead and down timber for personal use firewood, houselogs, or similar purposes is also allowed but requires the harvester to obtain a permit from the BLM pursuant to 43 CFR 5500. Section 811 of ANILCA directs the BLM that subsistence users must have reasonable access to public lands for subsistence use. See response to comment # 24-5.
9-1	The changes that BLM is considering to adopt will negatively affect our access to the land for hunting and fishing....restrictions will be imposed such as they have along the Alyeska Pipeline corridor...if mineral mining takes place within this area, area restrictions will be adopted to protect the workers, their camp and equipment.	The level hard rock mining likely to occur on BLM lands is so low, it is very unlikely to have any significant impacts on subsistence use. Based on past experience in opening areas to mineral exploration, it is envisioned that only 3-5 new small scale operations (defined as 250 cubic yard/day operations), and 1 medium-sized operation (5,000-7,000 tons/day) could result; no large scale operations like that at Red Dog are envisioned. This is based on both the low mineral potential of the planning area, and the remote locations of known mineral occurrences. Restricting subsistence users from accessing public lands is not allowed under ANILCA, and the Dalton Highway Corridor (referred to in comment as Alyeska Pipeline Corridor) is open to subsistence hunting for communities that live near and within the corridor (see Unit 24 Subsistence Hunting Regulations, 50 CFR 100 and 36 CFR 242).
11-3	The sale of lands should not be considered at all as our subsistence way of life would be threatened, through more people moving in, and this in turn would affect the migration of caribou, fish/animals would be depleted because of more hunting/fishing competition.	Thank you for your comment. See response to comment # 34-2.
12-1	I oppose mining that would affect our subsistence way of life. The Natives lives on all seasons of subsistence fall, winter, spring and summer	Thank you for your comment. See response to comment # 9-1.

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	17-1	I can contend to you today that subsistence has been severely impacted by the activities that I think BLM has permitted in terms of commercialism and that we haven't did a total inventory in our area as to how those impacts has added up until now.
18-1	If transporters will be allowed to do operations in this country all the way from the headwaters of the Koyuk River, Granite Hills down to Ungalik, if its anything like what it is up north, then subsistence will be drastically impacted.	Thank you for your comment. See response to comment # 75-2.
24-5	In some cases Native corporations may have developed land use policies for protection of the land for wildlife or subsistence purposes. When lands were selected by ANCSA corporations subsistence uses were of primary concern. I believe that BLM should develop a policy to protect subsistence uses in those cases even though ownership may revert to BLM.	BLM manages subsistence under the Alaska National Interest Lands Conservation Act (ANILCA). Section 802 of ANILCA (16 U.S.C. 3112) states the policy of subsistence management and use under ANILCA as: "consistent with sound management principles, and the conservation of healthy populations of fish and wildlife, the utilization of the public lands in Alaska is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources of such lands; consistent with management of fish and wildlife in accordance with recognized scientific principles and the purposes for each unit established, designated, or expanded by or pursuant to titles II through VII of this Act, the purpose of this title is to provide the opportunity for rural residents engaged in a subsistence way of life to do so." To this end, BLM is committed to cause the least adverse impact possible to subsistence use while still fulfilling its mandate of allowing multiple-use on Federal public lands.

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24-7	BLM must not avoid provisions that protect subsistence and must not put in place conflicting land use policies that negatively affect that priority. I believe allowing resource development on federally qualified lands violates ANILCA. BLM permitting does not always coincide with State or Native subsistence use priorities...Subsistence uses are maintained as a priority in Federal Law and BLM permits must reflect State and Federal Fish and Game laws and not negatively impact subsistence uses.	In ANILCA, the subsistence priority is directly related to the harvesting of resources, and specifies that harvesting for subsistence purposes will be given the priority over other harvesters (such as commercial or sport), if there is a shortage of resources. ANILCA Section 804 states that on Federal public lands the "taking of fish and wildlife for nonwasteful subsistence use shall be accorded priority over the taking on such lands of fish and wildlife for other purposes" and goes on to further define the criteria by which the decision to prioritize harvesters will be made, and is the responsibility of the Federal Subsistence Board. BLM is mandated to manage Federal lands for multiple use, including resource development, and this is not a violation of ANILCA. BLM strives to minimize impacts to subsistence as is mandated by ANILCA (see response to letter # 24-5).
24-21	It must be recognized that some subsistence uses have remained completely separate from the influence of mining and it may not hold any co-existence can occur between mining and subsistence under the broad and general statements within the RMP EIS....Traditional Native subsistence values are largely ignored under modern rules and regulations. Additional, commercial and sport uses from outside influences may bear upon the resources or RMP EIS and will affect my culture.	Much of this comment is unclear; subsistence use and mining, especially small-scale mining, has occurred concurrently throughout the state, and while there have been impacts to indigenous populations as a result of introduced diseases, this is not a direct reflection on mining, but on contact between people regardless of what motivates that contact. And, it is true that many of the rules and regulations regarding hunting and fishing, both those set by the State of Alaska and those set by the Federal Subsistence Board, do not incorporate traditional subsistence values, in part because those values vary from culture to culture. However, this is an issue beyond the scope of this plan, as the Federal Subsistence Board, and not BLM, is responsible for enacting subsistence management regulations through the Federal Subsistence Program. BLM is addressing the commercial and sport use within the planning area using recreation and travel management parameters as specified in Chapter II, Sections B(2)(d) and (e) "Recreation" and "Travel Management/OHV."
25-3	There have even been non-local hunters that have come into the Fish and Game office upset because they saw people leaving racks behind and only bringing in the meat...but the people it most affects are the local subsistence hunters and there is concern that villages in that area are being impacted by potential changes in the migration route.	The largest block of BLM-managed land within the major migration routes of the WACH is the Squirrel River watershed. A Recreation Area Management Plan will be developed for this area to address these concerns. When and if BLM receives any applications for linear ROW through caribou migration routes, impacts to caribou will be considered and mitigated to the extent possible. Facilities will be designed so as not to impede caribou movements.

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	31-5	Subsistence is really important to us and as far as numbers in terms of floaters, guides. You know I hope that somehow our village, our tribe, our elders could be involved in probably regulating those numbers with the State if its going to continue as it is.
31-7	Supposing that there was some decision made within this ANILCA Section 810 Analysis of Subsistence Impacts-the land that you own. For instance is there going to be any discrimination saying certain individuals can't hunt, its still open to natives is that the case?	An ANILCA 810 evaluation is not a decision document, but is an analysis of how a proposed action may affect subsistence. Because BLM must cause the least impact possible (see response to comment # 24-5) to subsistence under ANILCA, the 810 evaluation identifies those impacts that may occur, so that managers can alter the proposed action or mitigate the identified impacts in order to lessen impacts to subsistence. Section 811 of ANILCA directs BLM that subsistence users must have reasonable access to public lands for subsistence use.
33-1	We depend on this meat. What we hunt, we eat it. And if we allow sports hunters and trophy hunters to come in, they are gonna leave meat out there. Just drag them in the willows or whatever you know. I oppose this wild and scenic [rivers]. Thanks.	Thank you for your comment. See response to comment # 78-9.
34-2	I wish we would oppose all this selling of all the land; that would help us with our subsistence life.	The Preferred Alternative (D) allows for land sale in the immediate vicinity of Nome and Kotzebue (Table 2-16). Sale of BLM land is unlikely to occur.
36-1	We ask if you have any money for us to go out subsistence hunting, with this high cost of gasoline and fuel too. We know you guys ask for so much land, why can't you ask for gas to help us subsistence.	BLM is not authorized to use Federal funds as payments to communities or individuals for fuel, or to purchase fuel for a community's or individual's use. The land that is managed by BLM is considered public land, and it is held in trust by the Federal government for the benefit of all U.S. residents. In Alaska, these lands were defined as part of the land claims process (ANCSA and ANILCA).
48-3	The Section 810 determination should reflect that there is a dramatic impact from this mine itself [Red Dog] and there is no documentation or no baseline in dealing with the affects of our animals, our people from Red Dog Mine.	The ANILCA 810 analysis includes the Red Dog Mine and accompanying Portsite in the Cumulative Case, which was found to meet the threshold of "may significantly restrict" subsistence use. Given the low mineral potential of the BLM-managed lands within the planning area, a mine such as Red Dog is not likely to occur on BLM lands. Impacts from Red Dog Mine are discussed in Chapter IV, section (G) "Cumulative Impacts".



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50-1	But if somebody turns them (caribou) around, like in those Selawik Hills where they come from that direction then they're going to go way up, another 50, 60, 70 miles up there where we can't get at them.	Thank you for your comment. See response to comment # 25-3.
54-6	Place emphasis on protecting our fish and wildlife for local subsistence users.	Fish and wildlife are important resources, and we will make every effort to protect these resources and their habitats from undue harm as a result of management decisions by BLM.
58-68	[BLM should] assess the impact on subsistence related to recreational use of the Planning Area; determine how changes to current procedures will reduce negative impacts on subsistence;	Impacts to subsistence as a result of Recreation Management are described in Chapter IV, section F(3) "Alternative A", F(4) "Alternative B", F(5) "Alternative C" and F(6) "Alternative D" of the Proposed RMP/Final EIS.
63-2	A large portion of the local population relies on the land for subsistence hunting and fishing. For wildlife to remain plentiful and available, thus allowing adequate subsistence harvests, it is important that industrial development of the land be kept to a minimum. This is even more important now, as rising fuel prices (currently at \$4.00/gallon and expected to rise significantly in the next few weeks) impact household budgets, causing more and more people to rely on subsistence to help make ends meet.	While the Plan is proposing to open millions of acres to mineral location and leasing, the surface disturbance resulting from this activity is expected to be less than 6,000 acres (or less than one percent of the area involved) over the 20 year life of the plan. This represents the anticipated exploration and development activity to result from management actions in the planning area. This low level of development is not anticipated to significantly impact subsistence use or resources.

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64-10	<p>Ch.1, Introduction/p.10, Issue Statement 2, Subsistence: The second sentence states that ANILCA requires that rural residents have a priority over other users to take fish and wildlife for subsistence on Federal public lands where a recognized consistent and traditional pattern of use exists. This statement is inaccurate. ANILCA Sections 802 and 804 specify that rural residents shall be given preference (or accorded priority) for the taking of fish and wildlife over other consumptive uses only when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of that population. Please correct this sentence.</p>	<p>You are correct, this is an inaccurate statement in the Draft RMP/EIS. Thank you for pointing this out; it was corrected in the Proposed RMP/Final EIS.</p>
64-29	<p>Subsistence on pages 2-120 and 2-121, cooperation and coordination with ADF&amp;G and the state regulatory boards is not referenced either as a goal or management activity. The State continues to regulate subsistence harvesting on all lands statewide, except in specific locations where federal subsistence regulations supersede state regulations. Consequently, in this section we request BLM express its continuing commitment to working with the State on subsistence management activities.</p>	<p>BLM is committed to working with the State on subsistence management. Additional language regarding coordination with the State was added to the Proposed RMP/Final EIS, Chapter II, section (B)(5) "Subsistence".</p>

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64-41	<p>Pgs. 3-276 to 3-294: The narrative and maps in this section are very informative. The authors acknowledge that subsistence use data are not available for all communities (pages 3-280 and 3-282), but do not indicate if any significant gaps occur that should be addressed in order to fully assess local use and importance of Bureau lands for subsistence purposes. Identification of information gaps that need to be addressed in the plan is important to ensure that someone does not misinterpret the information when land use issues arise in the future and this plan is utilized in decision-making.</p>	<p>Thank you for your comment. Additional language was added to Chapter III, section (F) "Subsistence" of the Proposed RMP/Final EIS clarifying that there are information gaps in the subsistence data. BLM will attempt to identify information gaps and consider the most updated information when implementing decisions in the RMP.</p>
64-43	<p>Pg. 3-279, Subsistence Patterns Today, fourth paragraph: The first sentence indicates that during the scoping process, the public submitted comments that indicate protection of subsistence use is integral to the well being of Iñupiat people in the planning area. We...suggest the final plan modify the statement to recognize that subsistence is important to all residents of the planning area.</p>	<p>Thank you for your comment. An additional sentence was added to the Proposed RMP/Final EIS to address the fact that subsistence is important to all residents.</p>
64-44	<p>Pg. 3-284 Table 3-49: In the last column this table presents a dollar value of resources harvested for subsistence purposes...provide a notation explaining the figures in the table, e.g., whether the value is a per capita figure.</p>	<p>Thank you for your comment. The recommended change was made in the Proposed RMP/Final EIS.</p>

Letter # - Comment #	Comment	Response
65-33	<p>While BLM plans to hold the required hearings about impacts to subsistence under Alternative A and the cumulative case, BLM does not intend to seek public input on impacts to subsistence under the preferred Alternative (D), even though the agency acknowledges that significant impacts to subsistence use of the WACH could result under this course of action. RMP/DEIS, at D-13.</p>	<p>We disagree. Although the Draft Section 810 Analysis only identified a positive impact on subsistence in No Action Alternative and Cumulative case, participants at the hearings were encouraged to comment on all alternatives and the validity of the findings. According to BLM policy, a positive finding of "may significantly restrict" subsistence use for any alternative including the cumulative case triggers the requirement to hold ANILCA 810 hearing(s) in the vicinity of the area involved. ANILCA 810 hearings are for the purpose of eliciting input regarding subsistence from potentially affected communities. As was stated at the beginning of each 810 Hearing: "Before we begin to take comments I would like to stress that our meeting today is specifically to hear comments and concerns related to the Kobuk-Seward Peninsula Draft Resource Management Plan and Environmental Impact Statement and the ANILCA Section 810 finding in it. Your comments will serve several purposes. They will tell us if we have correctly identified the resources of the area, uses of these lands and the potential affects of the different alternatives in the Draft Environmental Impact Statement. You can suggest other alternatives that would reduce or eliminate affects on lands and resources needed for subsistence purposes. <b>You can also tell us if the proposed subsistence findings in the Draft Environmental Impact Statement are accurate and whether we have left anything out of our subsistence evaluation.</b> Finally, you can make suggestions or recommendations to us on things that we can do in order to minimize impacts to subsistence."</p>
65-37	<p>In addition, BLM determines that Alternatives B, C, and D will have no significant restrictions on subsistence uses in part because of "the management parameters outlined in Chapter II of the main document and including the Stipulations and ROPs found in Appendix A." RMP/DEIS at D-10 (Alternative B); see also RMP/DEIS at D-11 (Alternatives C and D). However, the stipulations and ROPs are not stringent. If these stipulations and ROPs are not adequate to protect the caribou herd, BLM's findings may not be supportable. Thus, it is likely that these alternatives [B, C, D] may have a significant restriction on subsistence uses.</p>	<p>A Resource Management Plan differs from, for example, a specific, detailed project request to BLM for a permit for use or occupancy. The purpose of a Resource Management Plan is to define in broad terms BLM's goals and objectives for resource management of an area, including potentially-allowed uses and protections. The Stipulations and Required Operating Procedures in this RMP comprise a list of overarching measures that would be taken for resource protection. For every individual project or request for permitted activity, an ANILCA 810 evaluation will be completed, and additional mitigation measures that serve to minimize project-specific impacts will be applied.</p>

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65-87	If a spill occurred in the planning area, it could have profound and lasting effects on the amount and quality of subsistence resources.	It is not likely that oil and gas leases will be let in this remote area of Alaska within the life of the RMP. However, it is an option that we are directed to consider, including the possibility of an oil spill. We agree that oil spills could cause deleterious effects on subsistence resources, and will strive to put in place appropriate mitigation measures, should leasing become viable. See also response to comment # 312-1.
65-131	Alternative A or the “No Action” Alternative, “may significantly restrict subsistence use and needs in the Squirrel River.” Appendix D, at D-7. This restriction cannot be approved under ANILCA. See 16 U.S.C. 3120(a). It is not necessary, as it would not occur under Alternative C. Furthermore, it does not involve the minimal amount of public lands necessary to accomplish the purposes of the Squirrel River’s intended use, and BLM has not proposed any steps to minimize the adverse impacts on subsistence uses that would result from this alternative. Alternative D does not meet the requirements of ANILCA.	Under Alternative D, BLM is proposing to hold the level of guide permits issued in the Squirrel River Area to the 2004-2005 level while completing a RAMP that would include significant input from local entities, including subsistence users. The final determinations referred to in the comment, i.e., Section 810(a)(3), if applicable, will appear in the Final Section 810 Analysis accompanying both the Proposed RMP/Final EIS and the Final RMP/Record of Decision as described on page D-17. See also response to comment # 198-5.
66-2	Development associated with mining and the roads needed for mining may produce sedimentation, erosion, pollution, and habitat loss, which would be deleterious to the resources that people from this region depend upon to support their subsistence lifestyle. Although some development is acceptable, it must be carefully regulated and monitored so that subsistence resources are protected.	We agree that these potential activities could harm resources if not designed, managed and monitored properly. When and if development such as this is proposed to BLM, an additional NEPA analysis including an ANILCA 810 evaluation will occur. The Required Operating Procedures in Appendix A also serve to prevent the impacts mentioned by the commenter.

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	75-1	Koyuk's longtime traditional subsistence boundaries, still being used by our people today, run from Isaac's Point up towards the head of Kiwalik River over towards the mouth of North Fork of East Fork River down Tipooktukearuk River down towards Ungalik River (Inglutalik River Inclusive). Any careless hunting, fishing, and mining activities occurring upon and near the headwaters of the rivers mentioned above, or connected to the rivers above, will negatively affect health of the fisheries and other renewable resources to the mouth of these rivers.
78-9	Almost every part of the document will in some way impact subsistence use and access. Subsistence is still the highest priority use for these lands and the overall charge of the Federal Government's responsibility as it relates to the lands they manage and to the people through the ANILCA 810 statute. There needs to be more consideration given these needs and the way the BLM goes about making sure local people are involved with the management activities and changes to these.	See response to comment # 24-5, and comment # 31-5. BLM will strive to put in place appropriate mitigation measures to ensure that negative effects to subsistence will be kept to a minimum.
80-1	Caribou hunting provides food on the table. Fishing and gathering are very critical to the residents in our area [Selawik] and need to be protected to the utmost level.	Caribou, especially the Western Arctic Caribou Herd, have been identified as a critical resource in the RMP. Several "Areas of Critical Environmental Concern" (ACECs) are proposed, most because of the role they play as critical habitat for the WACH. By designating these areas as ACECs we are able to apply additional protective measures and respond quickly to changes or threats that have yet to be identified. Please also see response to comment #78-9.
110-1	Our subsistence resource is already declining and with any development, further development, it would greatly decline our subsistence resources and mineral resource.	Thank you for your comment. See response to comment # 9-1.

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136-1	I am writing in favor of Alternative C which favors the conservation of our wildlife, fisheries and subsistence activities. There is nothing that can replace our wildlife and fish that we depend on for our lifestyle.	Management objectives for fish and wildlife, as well as required operating procedures to protect these resources when permitted activity occurs, accompany every action alternative in the RMP. See also the response to comment # 24-5.
197-5	Communities outside or adjacent to the Planning Area [such as Point Lay, Wainwright, Unalakleet, Huslia, Allakaket, Koyukuk, and Nulato] should have been given opportunity for Section 810 evaluation as many of these communities will also be affected by actions taken in the Planning Area.	Point Lay is within the Planning Area, and has been included in all correspondence, including receiving copies of the Draft RMP. Any Federally-recognized tribe has the ability to request to be included in the tribal consultation process. Additionally, BLM welcomed comments from any and all individuals, community entities, or other organizations. See comment #198-2.
197-18	Pg. 2-120 to 2-121 a) Goals: Fourth bullet should also include displacement from non-local and recreational hunters that are permitted by BLM.	We agree, and this was added to Chapter II, section (B)(5) "Subsistence" under goals.
198-3	BLM is violating of section 810 of ANILCA by allowing transporters and guides to use public lands under its jurisdiction before complying with section 810 of ANILCA. The borough requests that the BLM immediately refrain from permitting big game transporters, air taxis, guides, outfitters and their clients from operating on BLM lands until BLM has fulfilled its legal obligations under section 810 of ANILCA.	It is unclear in this comment how you feel BLM has not complied with ANILCA 810, and what the legal obligations you refer to are. Under the management plan currently in place (which this RMP is attempting to update) the only activity that you list which BLM permits (i.e., issues a permit for) is commercial guiding. In order to significantly change the current management parameters in place on lands in the planning area, BLM has to go through the planning process.

Letter # - Comment #	Comment	Response
198-4	<p>In explaining its rationale for waiting to take action until it has developed an RAMP in addition to the RMP, the BLM claims: "Under this scenario, impacts to subsistence users of the area due to increased competition from nonlocal hunters would continue, but would not increase, until which time the RAMP is in place." Appendix D-12. It is not possible for BLM to predict that impacts will not increase because there is absolutely nothing in BLM's current management or draft RMP that will prevent increased use by transporters, air taxis and their clients. Uses by transporters and their clients have in fact been increasing and will likely continue to increase given BLM's failure to manage these uses. Moreover, this statement seems to indicate that the only impact on subsistence users in the Squirrel drainage is due to "increased competition". This ignores disruption to caribou migration patterns and other significant impacts.</p>	<p>As an interim and information-gathering measure, BLM is proposing to require permits of all transporters and air taxis operating in the Squirrel River Area during development of the RAMP as part of the Preferred Alternative in the Proposed RMP/Final EIS. The permit will include the requirement of transporters to document and provide to BLM the number of people transported, and the location of all drop-offs and pick-ups. This information will be used in developing the acceptable use parameters within the RAMP. This finding for Alternative A in the ANILCA 810 evaluation was based on a variety of factors, including: testimony during the scoping meetings by local residents that described in detail impacts that they personally experienced due to increased competition by non-resident hunters; the increase in OHV use by hunters in recent years, leading to a degradation of habitat; an increase in air traffic resulting in the probable displacement of resources from subsistence harvest areas; and the low numbers of moose in the area according to recent ADF&amp;G monitoring.</p>



Letter # - Comment #	Comment	Response
198-5	<p>BLM's 810 analysis is wholly inadequate. As stated above [comment 198-4] , the alternatives evaluated in the Draft EIS and 810 analysis do not satisfy the requirement in section 810 that requires an evaluation of alternatives that would reduce or eliminate the use of lands needed for subsistence. BLM's stated strategy (Draft RMP/EIS at Appendix D-11 and 12) to allow transporters and the general public to have 'no set limits on use" while the BLM develops the RAMP is arbitrary, capricious and itself a continued violation of Section 810.</p>	<p>The purpose of an RMP is to define in broad terms BLM's goals and objectives for resource management of an area, including potentially-allowed uses and protections. The various resource management strategies presented in the Draft RMP/EIS represent a range of alternatives, each with defined parameters, including specific limitations and/or mitigation measures, for every resource use. This range of alternatives includes the designation of ACECs in order to identify and create special provisions for areas that are critical to subsistence and other resources, and which constitute reduction in use. The statement in the ANILCA evaluation that you refer to is not BLM's strategy, it is merely a statement of the fact that there is not a set limit on the number of nonlocal hunters who utilize this area - a limit that is set through hunting regulation by ADF&amp;G using the Tier II or registration permit process or by the Federal Subsistence Board by closing the area to nonsubsistence users. BLM is attempting to do what we can in this matter, given that the use that we are able to manage through the RMP is that related to the land - such as camping or allowing/not allowing OHVs - and not related to hunting. Because guiding is a commercial activity requiring a permit from BLM, we have some ability to manage this use. Hunting, whether it be by locals or nonlocals, is managed by the State or the Federal Subsistence Board, and not BLM. Allowing nonlocals to hunt in Unit 23 is not a decision that can be made by BLM, so the argument that BLM is making this decision arbitrarily or capriciously is wrong. Since the ANILCA 810 findings are on those uses under the control of BLM, the claim of a continued violation is moot with regard to this decision.</p>
198-6	<p>Each individual 810 evaluation for the Squirrel drainage guides is flawed because it fails to sufficiently analyze the factors required by the law. BLM simply makes conclusory statements in the required evaluations instead of genuinely taking a hard look at alternatives. Moreover, BLM has failed to look at the cumulative impact of all the guides it has permitted to use this area.</p>	<p>Thank you for your comment. Although BLM disagrees that our previous EA level 810 analyses were flawed, we are keenly aware that user conflict issues in the region are of the utmost importance. It was due to our awareness of these conflicts that BLM has not allowed new guides into the Squirrel River region since 2004/2005. The combination of capping the number of guides and increasingly restrictive hunting regulations (e.g., limited moose permits) has likely reduced the cumulative impacts of guides in the Squirrel River region from 2001. We believe you will find that the 810 analysis for this NEPA document (i.e., the Proposed RMP/Final EIS) fulfills all of our legal requirements and addresses your concerns.</p>

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198-9	It is hard to square BLM's determination that Alternative A meets the threshold for the 810 analysis because it may 'significantly restrict subsistence uses" but Alternative B, C and D do not. The 'Effects on Subsistence" described at 2-144 suggest that all the alternatives require analysis under Section 810 and under cut BLM's conclusory statements in Appendix D that they do not.	All Alternatives, as well as the cumulative case, were analyzed in the ANILCA 810 evaluation accompanying the Draft RMP/EIS (Appendix D). The ANILCA 810 evaluation for the Kobuk Seward Peninsula RMP resulted in a finding of "may significantly restrict" subsistence for Alternative A, the No-Action Alternative, for the Squirrel River drainage. This finding was based on a variety of factors, including: testimony during the scoping meetings by local residents that described in detail impacts that they personally experienced due to increased competition by non-resident hunters; the increase in OHV use by hunters in recent years, leading to a degradation of habitat; an increase in air traffic resulting in the probable displacement of resources from subsistence harvest areas; and the low numbers of moose in the area according to recent ADF&G monitoring. These factors, when combined, led to the finding of "may significantly restrict" for that area under the management scenario of Alternative A. All of the action alternatives in the plan (Alternatives B, C, and D) propose measures to be taken by BLM to rectify the situation within our legal jurisdiction, i.e., limiting the number of guides and outfitters authorized to operate in the area and limiting the number of visitor-use days associated with guiding. This new management scenario for the area will allow for a decrease in competition, an increase in access, and reduced disturbance to wildlife. It is for these reasons that Alternatives B, C, and D do not result in a finding of significant restriction for subsistence.
317-1	I prefer Alternative C, the option that protects wildlife, fish and subsistence and caribou. Why? It is one of our only means of food for basic survival and we will protect it with all our worth. We live off the land.	Management objectives for fish and wildlife, as well as required operating procedures to protect these resources when permitted activity occurs, accompany every action alternative in the RMP. See also the response to comment # 24-5.
<b>RMP/EIS Process</b>		
1-9	The references are so old that they are not suitable at all for making plans for the future. Taking 1950 information and using it to make plans for 2010 leads to complete inaccuracies and unreality.	It is not clear which reference you are referring to. Some references from the 1950's or even earlier are still valid sources of information.

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15-2	The Service concludes that several activities permitted under the preferred alternative may have adverse effects on listed species. Therefore, formal consultation under section 7 of the Act is required.	BLM is currently conducting informal consultation with the USFWS and if formal consultation is determined to be necessary, a BA will be prepared and formal consultation will be requested.
15-4	You described that wind turbines for power generation are only likely to occur immediately adjacent to communities within the Planning Area. It should be noted that if development of facilities were to occur later, consultation might need to be reinitiated if the assumptions of the scenario are violated, or other changes occur that would affect the conclusions of the original BA and BO.	BLM is aware of it's obligation to reinitiate consultation as required 50 CFR 402.16.
15-6	The Planning Area is within the ranges of the spectacled eider ( <i>Somateria fisheri</i> ) and the Alaska-breeding population of Steller's eider ( <i>Polysticta stelleri</i> ), both listed as threatened under the Endangered Species Act (Act). Due to the potential for projects authorized by the RMP/EIS to impact listed eiders, consultation under section 7 of the Act is recommended.	Thank you for your comment. See response to comment # 15-2

Letter # - Comment #	Comment	Response
15-7	<p>No other threatened or endangered species occur in the project area; however, Kittlitz's murrelet (<i>Brachyramphus brevirostris</i>), a candidate species for listing, is also thought to breed on the Seward Peninsula and north to Cape Lisburne and the Lisburne Hills. Additionally, the Service has been petitioned to list yellow-billed loons (<i>Gavia adamsi</i>) and polar bears (<i>Ursus maritimus</i>), both of which occur in or immediately adjacent to the Planning Area, under the Act. Under section 7 of the Act, candidate species and those petitioned for listing are not assessed as part of the consultation; however, if these or any other species are listed in the future, it will be necessary to reinstate consultation.</p>	<p>If any additional species are listed during the life of the RMP, BLM will reinstate consultation with the Service.</p>
23-2	<p>I would encourage BLM to consult directly with us [Bering Straits Native Corporation] as far as the future management and the effect of this on those sites [cemetery historic sites] and use of those sites by the Corporation's shareholders. And I believe that that would be required under Section 106 National Historic Preservation Act</p>	<p>Section 106 does not address ANCSA 14(h)(1) sites as well as it should. In many cases, these sites can fall outside the purview of section 106 in that cemetery sites are often not considered "historic properties", and many 14(h)(1) sites may not fulfill national Register eligibility criteria. That said, the prudent course for the BLM and other federal land managing agencies would be to recognize that these sites are significant and important to shareholders, and undertake consultation when considering undertakings that may adversely affect these sites, even if the affects are indirect. See also comment # 24-26.</p>
31-1	<p>And you said something earlier like well we are going to close hunting in this area if we chose this alternative. Which means are you going to treat the natives just the same as you do anyone else? Or are you going to treat the natives continuing this ANILCA Act where, you know we can come in. Even though you have an alternative can we continue to hunt?</p>	<p>BLM does not close hunting seasons. That is done by Alaska Department of Fish and Game, The Board of Game, and the Federal Subsistence Board. The Proposed RMP/Final EIS does not propose to close any areas to hunting.</p>

Letter # - Comment #	Comment	Response
31-3	When we talk about hunting and limiting those numbers and you talk about so many, 1,400 [VUD] for this time period you know, I don't think you are including us [Native communities] in that number. There are sports hunters they are allowing, talking about so just make sure that we know that there is a difference there.	The 1,400 visitor use days (VUD) proposed in the Squirrel River under Alternative B would only include VUD associated with guides and outfitters.
65-43	We request that BLM prepare a Revised Draft RMP/EIS that sets forth adequate ORV [outstandingly remarkable values] descriptions so that the public will have an opportunity to review and comment on this information before a Final RMP/EIS is issued.	In developing the list of eligible rivers (i.e. free-flowing rivers with one or more outstandingly remarkable values) we used input from the scoping and alternative development processes. Since all the rivers in the planning area are free-flowing, we focused on those rivers where the public or interdisciplinary team members identified important river-related values that should receive protection. Generally, the description of such values was quite limited in detail, as would be expected with such a large planning area. After looking at a sample of rivers that have been congressionally designated as components of the national wild and scenic rivers system, it was obvious that there is a wide range of river-related values that can meet the standard of being outstandingly remarkable. Rather than limit consideration of individual rivers over questions of eligibility, the team took a very open view of outstandingly remarkable values: if during scoping and alternative development certain river-related values were singled out for protection, then the values could be considered outstandingly remarkable, at least at the draft EIS stage. As a matter of interest, we received no comments on the Draft EIS that identified additional rivers with outstandingly remarkable values, nor did we receive any comments indicating the outstandingly remarkable values we identified in the Draft EIS were not outstandingly remarkable.
65-98	BLM should clarify whether it will rely on RMP/EIS for future decisions. BLM must provide key stakeholders in the region with opportunities to provide analysis and input on any proposals for future resource development, or other activities that may damage resources or resource values in the planning area.	Any site-specific proposal or request for permit from BLM must be in conformance with the Final RMP. When site-specific development proposals are received, BLM will analyze impacts through the appropriate NEPA document. These documents will be available for public input. Based on the results of the analysis, BLM will make a decision on whether or not to approve the project.

Letter # - Comment #	Comment	Response
65-99	The Final RMP/EIS also must clarify and provide a detailed explanation of how the BLM may tier off the document for future decision-making on resource development or other activities that may damage resources or resource values.	The tiering process is described in the BLM's National Environmental Policy Act Handbook (H-1790-1). Tiering is used to prepare new, more specific environmental documents without duplicating relevant parts of previously prepared, more general, or broader documents such as RMP/EIS. The decision to tier off the Final RMP/EIS would be made on a project specific basis. When a proposal is received, BLM will look at existing NEPA analysis, including the Final EIS and determine if it is appropriate to tier.
65-125	The Fairbanks District Office [should] follow the example set by the Glennallen District Office's Final East Alaska RMP/EIS in regard to clearly depicting changes made from the draft to the final document.	Thank you for your comment. A similar process was followed.
198-7	The BLM should immediately begin to develop a RAMP for the Squirrel drainage and should do so on an expedited basis. The RAMP should be independent of the RMP to allow it to move at a faster pace.	We have requested funding to begin a recreation area management plan (RAMP) for the Squirrel River in 2008. The Proposed RMP/Final EIS will identify the Squirrel River as a Special Recreation Management Area, making it eligible for funding for a RAMP.
<b>PUBLIC OUTREACH/INVOLVEMENT</b>		
1-6	Page 1-18- Where is your outreach to animal protection groups like Humane Society, Friends of Animals, Doris Day Protection League, IDA, etc	Public comments were solicited during scoping and the public comment period for the Draft RMP/EIS through Federal Register Notices, press releases, the BLM web page, newsletters, and other sources.
1-11	Since this is a National area, how are you planning to keep the national taxpayers who are taxed to support this area involved and aware of the changes BLM management has in mind.	The public will be informed through the BLM webpages, news releases, Federal Register Notices, Newsletters and other publications. Interested parties can request that they be kept informed by having their name added to the mailing list for this plan.
24-13	[T]argeting a presentation to the <i>International Society of Arctic Char Fanatics</i> is of concern because I am not aware of a presentation within this region other than perhaps a small circle of State or Federal fish biologists.	BLM is willing to give presentations on Arctic Char within the region. Any such presentations would be open to the public. We want to keep the local residents informed on Arctic Char issues and concerns.

Letter # - Comment #	Comment	Response
24-22	I feel that tribal consultation was grossly deficient for this RMP/EIS. I feel that BLM has NOT made the appropriate efforts with tribes for the RMP/EIS planning area.	BLM requested government-to-government consultation with 25 tribes within the planning area in March 2004. Newsletters outlining progress on the plan were mailed to these tribes during development of the Draft RMP. Seven scoping meetings and 10 public meetings were held within the region. A schedule of all these meetings was provided to all the tribes in advance of the meetings. The public comment period was extended to allow for additional input from Tribes. We received comments from several tribes on the Draft RMP/EIS.
24-23	I feel that BLM violated Executive Order #13175 which governs all Federal administrative procedures for tribal consultation. I feel BLM conducted the least level of correspondence when it considered this RMP EIS and has not fulfilled tribal consultation per Executive Order #13175.	EO 13175, with its overall charge to Federal agencies to consult and coordinate in the development of Federal policies that have tribal implications is carried out in the land management process through BLM's ongoing procedures required under NEPA and FLPMA. See response to comment # 24-22.

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	25-18	<p>...BLM has conducted a totally inadequate public process on this plan as well as preceding ones...accountability for conducting a public process should be based on the number of participants in your public process, and not simply the number of ads or poorly attended meetings you hold. An ad in the paper does not suffice, especially if no preliminary information efforts have been undertaken to explain to people the relevancy of the scheduled meeting. This could be done by being interviewed on the local radio stations preceding the meeting. Additionally, direct mail fliers explaining the relevancy in local terms of the meeting should be mailed to every box holder in the specific region where the meeting will be held-and the information should be clear and engaging and relevant. You may claim this is expensive but it is not...and it is certainly a minor expenditure in your overall process....BLM should be asking each village IRA and/or City Council, when their next scheduled meeting is and if they could present. They also don't need to send three people - one is enough. And that one person should remain an extra day and set themselves up at the City Office or IRA office and be available for discussion and questions.</p>
39-1	<p>We needed more time to go through the document.</p>	<p>The comment period was extended from August 4 until September 15.</p>
46-1	<p>I would like to have another extension on your proposal. You said we have until August 2006? Maybe it be better if you give us another 120 day extension or longer. So BLM could be able to meet with our tribe.</p>	<p>The comment period was extended from August 4 until September 15.</p>



Letter # - Comment #	Comment	Response
46-2	I now request, strongly request that BLM meet with our tribal leaders, and work out this draft....So I still strongly recommend that you do tribal consultation with our Tribe. We got a government. They are a recognized, sovereign tribe.	BLM requested government-to-government consultation with the Native Village of Point Hope in March 2004. Newsletters outlining progress on the plan were mailed to the Native Village of Point Hope during development of the Draft RMP/EIS. A public meeting was held in Point Hope on June 6, 2006. The public comment period was extended. All of these things are a continuation of the government-to-government consultation process.
46-4	We do have tribal organizations throughout the North Slope. We do have a mother tribal organization called Inupiat Community of Arctic Slope. Did BLM get a chance to consult with these people?... Did ICAS get to review the draft that was being sent out in April?...Did Native Village of Point Hope had a chance to review the draft before you called a public hearing? I don't know. Did Native Village of Point Lay have a chance to review the proposal?...I think you need to consult with our tribal organization called Native Village of Point Hope. They are a recognized tribal organization..	The Inupiat Community of the Arctic Slope was included on the mailing list and was mailed several copies of the Draft RMP/EIS. A copy of the Draft RMP was also sent to the Village of Point Hope, the City of Point Hope, and the Point Hope Native Corporation. The Draft RMP was mailed on April 28, the meeting in Point Hope was held June 6. Copies of the Draft RMP were also sent to the Village of Point Lay and the Point Lay Native Corporation. BLM requested government-to-government consultation with the Native Village of Point Hope in March 2004.
47-1	I asked the [City] staff if the draft was here and it was pretty alarming that yes there was a notice that the meeting was going to be here but apparently the draft wasn't here. And I guess the board or the corporate world did get that draft. So I want to, I wanted to tell, share things as far as the draft not being available as the staff of Native Village of Point Hope.	A copy of the Draft RMP was mailed to the City of Point Hope on April 28, 2006. A newsletter with information on how to obtain additional copies was mailed out on April 17, 2006. Additional copies of the Draft RMP were available in Point Hope during the public meeting on June 6, 2006. The Draft RMP/EIS was also available on the BLM website.
47-2	And I want to thank you for this time and the extension, for the opportunity for, boy I plead that we extend it a little bit.	Thank you for your comment. See response to comment # 39-1

Letter # - Comment #	Comment	Response
48-1	[T]here was no consultation with the Native Village of Point Hope, a Federally recognized tribe in regards to this plan. There was a schedule or indication that there was a planned scoping meeting that was to take place but Point Hope was not included in it and believes that is a violation of the consultation procedure that is essentially required in dealing with a government-to-government relationship with a federally recognized tribe and who are directly affected by decisions that are made by BLM.	Thank you for your comment. See response to comment # 46-2
48-2	Because of that [lack of consultation], we requesting for an extension of time and are requesting for another hearing to be made because of lack of consultation with the tribal council.	Thank you for your comment. See response to comment # 39-1
58-29	[T]he Working Group requests an opportunity to provide analysis and input to BLM on any resource development proposals that may damage caribou habitats in the Planning Area.	The Working Group's request to be involved in project scoping that may affect caribou is noted.
58-49	An additional public process should be conducted if industry asks BLM to change their ROPs and Stips and, if the changes are likely to affect caribou habitat, the Working Group must be consulted regarding the changes.	Before surface disturbing activities are approved, the BLM authorized officer must prepare an environmental assessment (EA) or EIS, if necessary, of the potential effects of the proposed activity on the natural and socio-economic environment of the affected area. Any changes made to a ROP will be addressed in the EA or EIS. It is important to note that the objective of the subject ROP will remain unchanged. Oil and gas lease stipulations include criteria for waivers, exceptions, and modifications. If the BLM Authorized Officer determines that a stipulation involves an issue of major concern, modifications, waivers and exceptions of the stipulation will be subject to at least a 30-day advance public review (43 CFR 3101.1-4).

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66-4	The potential use restrictions resulting from a change in BLM management plans must remain clear to those who access the land on a continual basis... Land ownership patterns may also make the resulting hunting regulations confusing, which may inadvertently result in non-compliance with the regulations. Therefore, there must be a balance between protecting the resources... and providing access to local users, and recognizing the realities of subsistence hunters.	BLM will continue to work with the Regional Advisory Councils, the Federal Subsistence Board, State Boards of Fish and Game, and State Regional Advisory Committees to reduce confusion between State and Federal hunting and fishing regulations. The Final RMP/EIS will be distributed widely to ensure that people are aware of management changes on BLM land. We will work to inform local residents of changes that may affect them.
197-1	EO 13175 Section 5 states: "Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications." We feel strongly that BLM did not follow this process as required by government-to-government relationships with tribes of the affected area.	Thank you for your comment. See response to comment # 24-22
197-19	BLM should have afforded the RACs an opportunity to review and comment on the Plan. Simply giving a copy of the plan to the RACs is insufficient. RACs are not scheduled to meet until October, after the comment period has closed. As such, there was no "meaningful voice" for subsistence users in the management process.	While Section 805(a)(3) grants authority to the RACs to review management plans, it does not mandate or describe a process by which Federal agencies or others interact with the councils. It simply grants the RACs the authority to carry out this task. BLM did make an effort to involve the RACs. The Northwest Arctic and Seward Peninsula RACs were given updates on the plan at every regularly scheduled meeting from initiation of the planning process in 2004 through the fall of 2006. They had an opportunity to review and comment on the plan during the public comment period. Subsistence users gave BLM input on the Draft RMP/EIS at 10 public meetings within the region, through written comments by individuals, the WACH Working Group, IRA Councils, non-profits, and Native Corporations.

Letter # - Comment #	Comment	Response
198-1	The Borough continues to object both on legal and policy grounds to the limited opportunity provided for comment. The Borough incorporates herein its letters of June 17, July 25, and August 29, 2006 laying out many of the borough's objections to the lack of meaningful opportunity provided to subsistence users to comment on the Draft RMP. Most objectionable was the unreasonable haste in holding 810 hearings in borough villages. The Borough repeats its request that BLM hold additional 810 hearing in the borough. The borough again reminds the BLM that the Secretary's 1984 policy implementing Section 810 requires at least 30 day notice before the 810 hearings can be legitimately held.	Thank you for your comment. See response to comment # 198-2 and # 46-1.
198-2	BLM is required under section 810 of ANILCA to notify the RAC prior to making any determination under 810(a)(3). Read together, it is clear that before finalizing the EIS the BLM must provide the RAC a meaningful opportunity to comment on its draft RMP.	BLM provided notice of the Section 810 Hearings and a copy of the Draft Section 810 analysis to 37 organizations or individuals on May 2, 2006. These included: The FWS coordinators for the NW Arctic RAC, the Seward Peninsula RAC, and the North Slope RAC; the chairs of the Fish and Game Advisory Committees in the region (S. Norton Sound AC, N. Norton Sound AC, Kotzebue AC, Lower Kobuk AC, Noatak/Kivalina AC, and N. Seward Peninsula); all IRAs within the planning area; the agency rep, chair, and coordinator for the Western Arctic Caribou Working Group; and ADF&G commissioner. Additional notice for the hearings was provided through: a press release on May 5; a Newsletter sent to 250 individuals or organizations on the mailing list on May 5; a schedule posted on the BLM website the first week of May; two display ads in the Nome Nugget in May. In addition, BLM met with the Northwest Arctic Borough on May 9th and provided them with a schedule of the hearings. See also response to comment #197-19.
198-16	A new draft EIS, including a revised 810 analysis, should be developed that includes an alternative that maximizes protection for the subsistence way of life and the fish, wildlife and resources and habitat that sustain that way of life. Without developing a new "protective" alternative, both the EIS and the 810 analysis are legally defective.	BLM will not be developing a new draft EIS. The Section 810 analysis was revised after development of the Proposed RMP/Final EIS as appropriate, based on changes to the preferred alternative. The final Section 810 analysis will be part of the Proposed RMP/Final EIS, and the Final RMP and Record of Decision.

Letter # - Comment #	Comment	Response
198-11	BLM' has Failed to Involve the Borough as a "Cooperating Agency" in the EIS process as Mandated by the Council on Environmental Quality.	BLM sent a letter to the Northwest Arctic Borough Mayor on May 17, 2004. The last paragraph of the letter states: "This letter serves to inform you of the Resource Management Planning process and invites you to participate in the process." We apologize for not more clearly stating an invitation to be a cooperating agency in this letter. BLM developed guidelines to incorporate President Bush's Executive Order on Cooperative Conservation in 2005. This planning effort began in January 2004, before these guidelines were available. We would like the Borough to be a cooperating agency on the Recreation Area Management Plan for the Squirrel River.
<b>NEPA ADEQUACY, RANGE OF ALTERNATIVES, CUMULATIVE EFFECTS</b>		
51-9	As part of the cumulative effects analysis, the RMP/EIS should evaluate the past, present and reasonable foreseeable future actions associated with the Kobuk-Seward Peninsula Planning Area. The geographic boundary for consideration of the reasonably foreseeable future actions should include areas within and adjacent to NPR-A, Beaufort Sea, Chukchi Sea, Kotzebue Sound, and Norton Sound.	The RMP/EIS evaluates the past, present, and reasonably foreseeable future actions within the Planning Area as part of the Cumulative Effects Analysis. The geographic area of consideration included the planning area and adjacent areas, including NPR-A.
52-59	p.4-206 - c,Speculative Development: No mention is made of the construction of a rail system in the planning area. If multiple resource development projects occur in the region, such as the development of minerals in the Brooks Range and coal or other hydrocarbons in the Northwest Arctic, a railroad would be logical and this should be addressed in the plan.	We were unaware of any serious proposals (applications for permits or funding) to construct a rail system in the planning area. We would consider such a project highly speculative during the life of the RMP.

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	58-21	Under the BLM preferred alternative, fluid and solid mineral leasing and development would be allowed in nearly all critical caribou habitats. According to the BLM chart featured on 2-128 of the RMP, the impacts on wildlife from oil and gas development under the Preferred Alternative would be the same as Alternative B in it potential impacts to wildlife and habitat, particularly caribou. If this is the case, the BLM cannot claim that Alternative D strikes a balance between utilitarian use and conservation since the implications to wildlife are the same in both alternatives.
58-24	The Draft RMP/EIS acknowledges that the current quality of caribou habitat in the planning area is largely unknown (See RMP/DEIS at 3-58). It further acknowledges that the "combination of ongoing and future oil and gas development occurring on both State and Federal lands" in the North Slope and in the planning area would have cumulative impacts on the WAH and that new development could potentially have "significant" impacts on the caribou herd (See RMP/DEIS at 2-128). NEPA requires an analysis of these cumulative impacts, but the draft RMP/DEIS fails to provide such an analysis. It is not sufficient to reserve an analysis of the cumulative impacts until mineral development activity actually occurs. The minimal analysis provided regarding impacts on caribou for the various alternatives under consideration indicates that some areas, if subject to mining disturbances, could take decades to recover (RMP/DEIS at 4-71 to 4-72). The minimal protections afforded to caribou habitat are not sufficient to ensure that the herd is not disturbed.	The RMP/EIS analyzes the type of cumulative impacts that may affect caribou due to reasonably foreseeable future actions in the planning area and on the adjacent North Slope, Chapter IV.G.2.c)(2). Due to great uncertainty in the timing, type, and location of future development, it is very difficult to quantify such effects or even determine which activities are reasonably foreseeable. Under the Reasonably Foreseeable Future Development scenarios for the RMP, the total acres exposed to long-term disturbance from all forms of mineral activity would be fewer than 1,000 acres or less than 1% of the calving/insect relief habitat on BLM land within the planning area. An additional 4,322 acres may be disturbed due to pipeline construction; this would be short-term disturbance, as construction activity would occur during the winter when the ground is frozen and the pipeline would be elevated. Again, this would be less than one percent of the available habitat on BLM land (Chapter IV.A.2.).

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58-25	Alternative C...provides that some areas will be closed if retained under federal ownership, but does not provide analysis of the anticipated impact if these areas are not retained under federal ownership.	Conveyance is a non-discretionary action and is not subject to NEPA analysis. See Chapter I.D.2.b). One assumption for analysis (Chapter IV.A.2.a.) is that State and Native entitlements will be met during the life of the plan and the amount of BLM-managed land in the planning area will be reduced by up to 7 million acres. Assuming any particular level of activity on these lands after conveyance would be speculative.
58-26	Under the analysis provided in the RMP/DEIS, it is not clear that the restrictions (i.e. seasonal constraints) and closing selected areas is sufficient to protect the caribou herd.	The RMP/EIS does not anticipate any population level impacts on caribou under Alternatives A-D. Thus, one can conclude that the restrictions would be sufficient, or the level of impact low enough not to threaten the continued existence of a viable caribou herd. Seasonal constraints and other ROPs will not prevent all impacts to caribou but they will minimize impacts.
58-42	In the Draft RMP/EIS each alternative will allow industrial exploration and development activities within the Planning Area. The Draft RMP/EIS should evaluate and describe cumulative effects of those activities on caribou habitat and populations throughout the entire range of the WAH.	The RMP/EIS evaluates and describes the cumulative effects on caribou throughout the entire range of the herd. Given the lack of knowledge about the timing, type, and location of reasonably foreseeable future activities, these impacts are described in a qualitative manner rather than a quantitative manner.
58-43	In the Draft RMP/EIS each alternative will allow industrial exploration and development activities within the Planning Area. The Draft RMP/EIS should evaluate and describe cumulative effects of those activities on subsistence and other uses throughout the entire range of the WAH.	The RMP/EIS evaluates and describes the cumulative effects on subsistence throughout the entire range of the herd. Given the lack of knowledge about the timing, type, and location of reasonably foreseeable future activities, these impacts are described in a qualitative manner rather than a quantitative manner.
58-50	Cumulative effects analysis of industrial activities within the Planning Area must also address concurrent climate change issues in the Arctic and appropriate risk analyses should be conducted.	Additional language on climate change has been added to the RMP/EIS.

Letter # - Comment #	Comment	Response
	58-53	The Draft RMP/EIS should evaluate the tradeoffs between short-term resource exploration and development activities and their resulting benefits versus long-term sustainable uses of caribou in terms of social, cultural, and economic values.
65-1	We do not find the draft Kobuk-Seward plan's "preferred" alternative to strike a good balance between conservation of the resources and development within the planning area. We are disappointed by how similar Alternative D (BLM's "preferred" alternative) is to Alternative B (the extreme pro-development alternative). We feel that the "preferred" alternative prioritizes short-term development opportunities over the long-term, sustainable management of natural resources, wildlife habitat, and subsistence resources.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS. See also response to comment # 73-1.
65-71	BLM has omitted analysis of the impacts that conveyance of selected lands will have on the parcels remaining in Federal ownership. We acknowledge that the RMP will not affect conveyance. However, conveyance could affect the RMP and may alter the impacts to the land anticipated by the RMP. Though the RMP cannot influence the conveyance process, it can take that process and the uncertainties associated with it into account as it tries to plan a management strategy for the un-conveyed lands to be retained by BLM.	Thank you for your comment. See response to comment # 58-25.



Letter # - Comment #	Comment	Response
65-70	BLM does not adequately consider the impacts of land conveyances. See 40 C.F.R. 1508.7. BLM should, at a minimum, provide further details and analysis concerning the lands selected. The conveyance of at least some of the selected lands is reasonably foreseeable; it is the location and the timing of the conveyances that is less clear.	Thank you for your comment. See response to comment # 58-25.
65-77	[C]onveyance actions are not listed among the "activities considered in the cumulative case." RMP/DEIS, at 4-204. Given the high percentage of land in the planning area selected by either the State or Native corporations, the Final RMP/EIS needs to consider the uncertainty associated with which lands will be conveyed as part of the planning process.	Land conveyance was added as a reasonably foreseeable future action in Chapter IV.A.2.a). Assuming any particular level of activity on these lands after conveyance would be speculative. See also response to comment # 58-25.
65-78	BLM has not provided information as to what lands are selected within areas critical for the WACH; without this information, BLM has not provided the requisite level of analysis for predicting effects on the WACH from development in the various selected areas.	Maps 2-20 and 2-21 show selected lands within proposed caribou ACECs. One of the assumptions for analysis is that State and Native entitlements will be met during the life of the plan, reducing the amount of land within the BLM planning area by up to 7 million acres. Land conveyance is an ongoing, non-discretionary process which is taking place outside of this planning process. Reasonably foreseeable future development on State or Private land (which includes any lands conveyed in the future) are considered in the cumulative effects analysis.

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65-79	<p>Just as the agency may not act first and study later where impacts of an action are unknown, Nat'l Parks and Conservation Assoc. v. Babbitt, 241 F.3d 722, 734 (9th Cir. 2001), it similarly should not act first in opening up all lands to development and then study and deal with the impacts of conveyances later. The agency [BLM] needs to better evaluate the impacts from this reasonably foreseeable development now, when it can use that information to try to minimize the impacts of the development through the RMP, rather than later, when the opportunity to incorporate responses to the impacts into planning is gone.</p>	<p>In the court case referred to by the commenter, the court found that the NPS had failed to show that the potential impacts were in fact insignificant and thus an EIS was required (failure to take a "hard look"). The referenced court case is different from the situation in the planning area. BLM is doing an EIS and the agency's conclusions have been reached by a reasoned extrapolation of the available data. The only action that is "reasonable certain to occur" is the conveyance of land. Assuming any level of activity after conveyance would be speculative - as speculative as assuming some development level on lands already owned by others but with no "proposal."</p>
65-88	<p>As planning and development of NPR-A pushes westward, BLM should adequately describe the cumulative impacts of potential future transportation infrastructure within the entire region, including the Kobuk Seward planning area. Land managers must evaluate these changes and determine how they will be integrated within the entire western Arctic and the North Slope communities. Cumulative impacts from oil and gas development, coal extraction, hard-rock mining, and the associated transportation infrastructure within the western Arctic need to be fully analyzed relative to their potential impacts on Arctic caribou.</p>	<p>Chapter IV, Cumulative Impacts, describes the cumulative impacts of potential future transportation infrastructure, oil and gas development, and hard rock mining in the region. Activities considered in the cumulative case include past development such as oil and gas development on the North Slope over the past 30 years, seismic exploration and exploratory drilling in NPR-A; present and reasonably foreseeable future development such as Red Dog and Rock Creek Mines, the Nome Road system, and De Long Mountain Terminal; and speculative development such as the Yukon River Highway. The commenter's request would require that BLM speculate on what a transportation system that will be constructed far in the future would look like. NEPA does not require such speculation.</p>

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65-97	BLM Failed to Comply with NEPA in analyzing mineral leasing impacts — In direct contravention of its duty to take a “hard look” at potential environmental effects, BLM solely listed general potential impacts.	The analysis represents best estimates of impacts since exact location, timing, type, and extent of development are unknown. Impacts are quantified to the extent practicable with available data. In the absence of quantitative data, best professional judgment provides the basis for the impact analysis. The separate technical documents, Mineral Occurrence Reports and Reasonably Foreseeable Development Reports prepared for Leasable and Locatable minerals, are the basis for the assumptions for analysis, and are available from the State and Field offices and are available on BLM's website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a>
65-110	The draft plan fails to fully consider the cumulative impacts the proposed management strategies will have on the climate, landscape, wildlife habitat, and resources of Northwestern Alaska.	Chapter IV.G.2. of the Proposed RMP/Final EIS considers cumulative impacts on wildlife habitat and other resources found within the planning area. We do not anticipate that the Proposed RMP will result in any impacts on climate.
65-126	The draft Kobuk-Seward RMP places far greater priority on the desires of the mineral development industry, and does not adequately address the needs of all other multiple-users of these BLM-managed public lands.	The RMP/EIS includes management objectives and decisions for many multiple use activities including soil, water, air, fish, wildlife, recreation, forestry, grazing, and cultural resources. Appendix A includes 23 pages of required operating procedures that would apply to permitted activities on BLM land.
72-5	[I]t would be helpful if the RMP/EIS identified the environmentally preferred alternative; ...the alternative that will promote the national environmental policy expressed in NEPA section 101.	BLM will identify the environmentally preferred alternative in the Record of Decision as required by 40 CFR 1505.2
73-1	While the drafters of the management plans tout that the preferred alternative “D” represents a balance of the alternatives, a closer review actually reveals that it is strikingly similar to Alternative "B" which emphasizes resource development.	Alternative D is similar to Alternative B in that the reasonably foreseeable development scenario for minerals is the same for both alternatives. Features in Alternative D but not in Alternative B include designation of six ACECs, identification of one additional special recreation management area, additional oil and gas leasing stipulations and required operating procedures, and designation of one right-of-way avoidance area.

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<b>GENERAL</b>		
1-7	Page 2-3 I favor Alt C but think it should be beefed up with more protections for animals and vegetation than it presently offers.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS.
15-3	For many of the activities it is not clear what level of development may occur (e.g., oil and gas). In order for the Service to assess potential adverse effects, BLM should develop reasonable scenarios to describe the anticipated activity levels. The assumptions used to develop these scenarios should also be stated.	BLM has developed reasonably foreseeable development scenarios for mineral development. These are summarized in the Assumptions for Analysis in Chapter IV. The full scenarios are available in separate technical documents, Mineral Occurrence Reports and Reasonably Foreseeable Development Reports prepared for Leasable and Locatable minerals. These documents are available from the State and Field offices and on the BLM's website at <a href="http://www.blm.gov/ak/ksp/">http://www.blm.gov/ak/ksp/</a>
24-10	I feel that allowing for increased trail or road access will allow for areas to become trashed, sensitive arctic and sub-arctic plant communities to become destroyed, sensitive arctic and sub-arctic fish and wildlife populations to become impacted, and visual resources to become degraded.	The Proposed RMP/Final EIS institutes OHV designations which will limit access when compared to the No Action Alternative. The limited OHV designation proposed in the RMP will allow for further restrictions in specific areas if impacts to resources becomes a problem.
24-29	The geographic setting should include all of the Seward Peninsula; the RMP/EIS characterization of the northern Seward Peninsula only is erroneous.	The wording in this section has been changed to clarify that the entire Seward Peninsula is within the Planning Area.
52-1	Alternative D would unnecessarily restrict valid multiple use activities.	Alternative D provides for a wide variety of multiple use activities while providing protection for natural resources.
52-116	p.2-119 - (4) Social and Economic: The heading: "Social and Economic" is misleading as it includes only a discussion of public safety. Suggest making "public safety" the heading.	This heading was re-worded for clarity.

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54-2	Further restrictions on land use will only limit the amount of enjoyment that we can get from the land...make the land accessible to people for fishing, hunting, and other recreational activities.	The Proposed RMP/Final EIS makes BLM land accessible to people for fishing, hunting, and other recreational activities. The Plan incorporates some limitations on off-highway vehicles.
54-5	Let's promote tourism as Alaska's best, most renewable, least harmful source of income.	The Proposed RMP/Final EIS allows for the promotion of tourism.
58-16	Note that p.2-10 of the planning volumes incorrectly refers to the plan as a "Strategic Management Plan."	This correction has been made in the Proposed RMP/Final EIS.
64-11	We appreciate acknowledgement of the State's role in managing and regulating fish and wildlife harvests in the planning area, and of the Master Memorandum of Understanding (MMOU) between the Alaska Department of Fish & Game and the BLM. However, we request the Bureau include a copy of the MMOU as an appendix in the final plan.	The Master Memorandum of Understanding has been added as an appendix to the Proposed RMP/Final EIS.
64-35	Pg. 3-206: Please edit the following sentence: "Consequently in some instances it is difficult to separate production from these areas outside....."	This correction has been made in the Proposed RMP/Final EIS.
64-36	Pg. 3-208 (5) Commodity Value and Market Share, third sentence: The text reads, "...our biggest year was 1993 where we sold \$274,215 worth of..." Replacing "we" with BLM would clarify this statement.	This correction has been made in the Proposed RMP/Final EIS.
64-54	WACH ACEC: The preferred Alternative described in Table 2-10 on page 2-61 appears to be inconsistent with Alternative D for Locatable Minerals as described in Table B-2. Correct Table B-2 to be consistent with Table 2-10.	This correction has been made in the Proposed RMP/Final EIS.

Letter # - Comment #	Comment	Response
	66-1	While it is appropriate to have "wild and scenic" designations for some river systems and especially those on the southern Seward Peninsula, this designation would not be useful because the spawning salmon habitats are generally within Native Allotments, which are not affected...Land ownership and subsequent regulations, would become more convoluted for local users, leading to confusion and possible non-compliance. It is important to balance the conservation of the resource with the realities of access, land ownership and regulation changes, as well as subsistence needs of local users.
72-1	[Review Table 2-19]...In some cases, the impacts are not quantified. For example, in Effects on Wildlife under Alternative B, "Increased mineral exploration and development would increase the level of impacts to wildlife and their habitat." In Effects on Wilderness Characteristics under Alternative B, "After construction, structures, human presence and associated activity and noise would have adverse impacts on solitude, naturalness, or primitive/unconfined recreation." In both examples, the reader is left to wonder how widespread and great the impacts would be. In other cases, the impacts are usually described as localized, short-term, negligible and minor...[T]he terms widespread, long term, moderate, and major either do not appear or appear rarely in the comparisons. This gives the reader the impression that the environmental consequences of all the alternatives are relatively benign and generally will not extend beyond BLM-managed lands. If that is correct, then the language should stand. If it is not, it would be useful if the impacts were better, more accurately described.	Table 2-19 is a summary of effects by alternative. Alternatives B, C, and D are compared to Alternative A. For a fuller description of the impacts, see Chapter IV, Environmental Consequences. The commenter is correct that impacts are not always quantified. The location, timing, and types of projects that may occur within the 13 million acre planning area over the next 15 years are unknown, making it difficult to quantify impacts. The environmental impacts anticipated from implementation of the Proposed RMP are relatively benign and in most cases will not extend beyond BLM-managed lands. Additional discussion was added to Chapter IV to address cases where impacts may extend beyond BLM-managed land.

Letter # - Comment #	Comment	Response
72-2	Though Chapter IV, "Environmental Consequences," gives a more detailed comparison of the effects of each alternative resource, the layout of the chapter can make it difficult to compare the consequences of each alternative. For example, if the reader wants to compare the impacts of grazing on wildlife, he has to turn back and forth between pages 4-69-70, 72, 74, 81, and 83.	Determining the best way to organize the impact analysis is difficult. The layout used in the Draft RMP/EIS does make it difficult to compare impacts of grazing on wildlife for example, between the four alternatives. This is one reason for Table 2-19. If one wants to look at the impacts of one entire alternative on wildlife, the organization in the Draft RMP/EIS makes it easier to do so. We struggled with this dilemma during development of the Draft. We chose not to reorganize the document at this point but thank you for your comment.
72-3	Compare the language describing the impacts of special designations under alternatives B, C, and D on pages 4-80, 4-82, and 4-84 respectively. There are no definitive statements made in a consistent vocabulary that tell the reader to know how important special designations are to wildlife. The reader wonders whether alternative C really offers significant benefits over alternative D.	This section of the Proposed RMP/Final EIS was revised to clarify.
72-4	[T]he document does not include an analysis of the environmental impacts to the NPS-managed and other lands within and adjacent to the planning area. While these lands are not subject to RMP/EIS actions, we believe the plan would best describe the potential effects upon them.	Chapter IV, A. Introduction discusses assumptions for non-BLM lands used during analysis. Additional impact analysis has been added to those programs where there could be an effect on non-BLM land. For the most part, impacts are expected to be localized and mostly limited to BLM land. If a future project proposal includes facilities off of BLM-managed land, the NEPA analysis for the project would analyze impacts on other lands and approval of other involved land owners would be required before the project could proceed.
116-4	Commercial and private hunting and fishing activities on these lands are dependant upon healthy game and fish populations and the endurance of natural habitat. This will be threatened if precautions are not taken to preserve Alaska's wild areas. We support protective measures, such as appropriate ACEC and SRMA designations and the retention of the ANCSA 17(d)(1) mining withdrawals, which will help ensure sustainable future management of wildlife and fish populations.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS. The Preferred Alternative identifies two special recreation management areas and several areas of critical environmental concern to improve management of natural resources and hunting/fishing related recreation.

Letter # - Comment #	Comment	Response
130-3	I support protection of Alaska's Kobuk-Seward Peninsula and do not want to see it opened to resource development due to impacts on wildlife, ecosystems, caribou, Native people, subsistence, wilderness, habitat, the general environment or because it will lead to increased pollution or environmental degradation. Resource development in this area will harm sensitive calving grounds, summer habitat, and wintering grounds for the Western Arctic Caribou Herd.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS. The Preferred Alternative contains numerous required operating procedures and special designations that will serve to protect natural resources and subsistence uses in the planning area.
130-5	It is our moral responsibility to protect our nation's most pristine wilderness areas for future generations. These areas should also be preserved because of the economic value of wilderness areas, value as undisturbed areas for research, value of pristine areas for tourism.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS.
373-1	I live, hunt and fish in the balm's plan area (northwest Alaska). While I support managed development to help reduce heating/transportation costs in the plan area, the plan must consider detrimental effects to ensure continued growth, maintenance and harvest of the renewable resources.	Thank you for your comment. It was considered during development of the Proposed RMP/Final EIS. The Preferred Alternative contains numerous required operating procedures and special designations that will serve to protect natural resources and subsistence uses in the planning area.
477-2	We would like to see some public land that is within reasonable reach by the broader public preserved and protected from commercial development. Given that the population here [Nome] is significantly cut off from recreational and /or scenically preserved public lands elsewhere in the state, it seems appropriate to make some lands available to those who cannot readily travel to enjoy other preserved areas of the state.	The Preferred Alternative in the Proposed RMP/Final EIS identifies the Kigluaik Mountains as a special recreation management area. The RMP includes management objectives to maintain the visual, wildlife, fisheries, and recreational values of the planning area. Most BLM lands in the planning area are expected to remain in a primitive and natural state.



Letter # - Comment #	Comment	Response
	198-14	BLM should carefully examine whether it has the financial support, resource specialists, permit administrators and law enforcement personnel to manage the additional permit activity that would accompany the changes suggested by the EIS, particularly as to Alternatives B and D.
64-56	It may be useful to include as an appendix the Fact Sheet "Generally Allowed Uses on State Lands and Conditions for Generally Allowed Uses" since it is frequently referenced.	This has been added as Appendix G in the Proposed RMP/Final EIS.
<b>MAP COMMENTS</b>		
22-1	how come our Koyuk River wasn't on the maps?..and where BLM and the private land..	The Koyuk River was added to the maps (Alternative D maps from the draft EIS) for the Proposed RMP/Final EIS. Generalized Land Status was not displayed on all maps to maintain visual clarity of map subject matter. However, Land Status is featured on Map 1-1 and several other maps throughout the plan.
52-44	p.3-312: The geographic locations of several features mentioned in the text should be shown on a map (Salmon Lake, Kigluaik Mountains, Mount Osborn).	Map 1-2, A General Relief and Features was added to the Proposed RMP/Final EIS to display features frequently mentioned in the document text.
58-45	Maps of the caribou habitats and movement corridors should be included in the Final RMP/EIS.	BLM included Map 3-12 which displays caribou range with the best available data provided by the State of Alaska - ADF&G. In addition, a new map will be included to show caribou movement using a dataset provided by ADF&G (Map 3-46)
64-15	Page 2-53, Item 6, Alternative D. The second sentence appears to contradict the first sentence. If 12,074,000 acres are open to coal exploration and 1,059,000 acres are closed, the percentage of lands closed cannot total 60%. The table on page 2-54 appears to reflect the correct percentage. We suggest checking acreage and changing the percentage of closed acreage in the text on page 2-53 to be consistent with Table 2-9.	This is a typographical error, the percentage used in the first paragraph of item 6 of the Solid Leasable Minerals section was changed to reflect that 8% of BLM-managed lands are closed. The amended text reflects the correct percentage as shown in Table 2-9.

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	64-42	Pg. 3-279: The two paragraphs reference a series of maps with generalized depictions of areas used by planning area communities for subsistence purposes (Maps 3-37 thru 3-45). We recommend the Bureau add language to the map legends indicating the time period depicted by the maps.
64-58	A series of maps depicting the relationship of the SRMAs and ACECs and other associated restrictions would be very useful although we recognize that visually depicting this much information on one map (for each alternative) may be challenging. Of interest would be the relationship of the Salmon Lake - Kigulaik SRMA, the Kigulaik ACEC and the Mt. Osborne RNA. Another area that would benefit from further visual clarification is the Nulato Hills ACEC (Alternative C) versus the combination of the Nulato Hills, Inglutalik River, Ungalik River and Shaktoolik River ACECs (Alternative D). We would appreciate an effort to visually depict the sum of the land management strategies of Alternative B, C, and D. We suggest including boundaries of the ACECs, SRMAs, ERMA, Mineral closure areas, NSO areas, and other pertinent restrictions.	While attempting to display the sum of the land management strategies was not possible on one map, 4 maps (summarizing Mineral Management and Special Designations) for Alternatives C and D have been added to the Proposed RMP/ Final EIS. (Maps 2-23, 2-24, 2-25, and 2-26)
<b>CLIMATE CHANGE</b>		
51-2	...the Final RMP/EIS should address the potential climate change effects on the region as a reasonably foreseeable future action.	For the purposes of analysis, this document assumed that climate change was occurring as part of the baseline. Additional discussion of climate change is included in Chapter IV, Cumulative Effects and in various other parts of the document. Many of the results of climate change will not occur during the life of this plan (15-20 years).

Letter # - Comment #	Comment	Response
51-10	<p>The final RMP/EIS should consider how the proposed actions, alternatives, goals and objectives may influence the emissions and sinks of greenhouse gases, thereby contributing to, and/or reducing impacts to climate change. Specific management strategies should be considered to minimize potential adverse effects of greenhouse gases and regional climate change. The Final RMP/EIS should include information that considers how climate change could potentially influence the proposed actions in the Kobuk-Seward Peninsula Planning Area.</p>	<p>It is highly unlikely that actions authorized under this RMP will contribute significantly to global climate change. The RMP does provide enough management flexibility to respond to climate change and to mitigate those impacts that can be affected by BLM actions. Most climate change models are global and may not predict local changes very accurately. In addition, feedback loops are not well enough understood to predict changes on the local scale. Some additional general discussion on climate change was added to the Proposed RMP/Final EIS in Chapter III and Chapter IV, Cumulative Effects.</p>
51-11	<p>In particular, climate change will have a profound effect on the arctic polar environment. As the polar arctic ice cap retreats, new opportunities are created for international circumpolar marine transportation routes. The Final RMP/EIS should plan for this reasonably foreseeable future opportunity and evaluate the potential cumulative effects associated with summer and/or year round international transport of oil and gas, hard rock mineral, and coal resources to world markets.</p>	<p>The projected life of the Final RMP is only 15-20 years. The changes discussed by the commenter are not reasonably foreseeable during the life of this plan.</p>
58-8	<p>The Draft RMP/EIS lacks adequate consideration of climate warming/climate change and its effects on caribou, habitats and ecosystem relationships. Any responsible attempt to create an effective long-term plan spanning the next 10-20 years for the area must address the impacts of climate change on the region.</p>	<p>Some additional general discussion on climate change was added to the Proposed RMP/Final EIS in Chapter III and Chapter IV, Cumulative Effects.</p>

Letter # - Comment #	Comment	Response
	58-9	In addition, melting of permafrost affects transportation infrastructure and structures. The Draft RMP/EIS should acknowledge the need to revise current standards in the face of rapid climatic changes.
58-10	Forest ecology is modified by climate change and warming climates are having significant impacts on Alaska forest ecosystems...Disturbance to normal forest processes reduces forest performance and increases vulnerability to disease and fire. Mature black spruce forests, which are most vulnerable to fires when mature, provide important habitat for caribou by supporting lichens that caribou rely on during the winter. The effects of climate change on these types of habitats related to caribou should be considered and evaluated for lands within the Planning Area.	Only 8% of the planning area supports forest lands. The spruce woodland/shrub community often has conspicuous amounts of lichen cover and provides habitat for caribou. However, this vegetation type is present on less than 4% of the planning area. The Proposed RMP/Final EIS recognizes that climate change may affect vegetative resources, and some additional discussion of the impacts of climate change have been added to the Proposed RMP/Final EIS (Chapter III, "Affected Environment" and Chapter IV, "Cumulative Effects").
58-35	Cumulative effects analysis of hard rock mining and other industrial activities within the Planning Area must also address concurrent climate change issues in the Arctic and appropriate risk analyses should be conducted.	Additional discussion on climate change has been added to the RMP/EIS in both Chapter III and Chapter IV cumulative impacts.
65-111	As temperatures rise, discontinuous permafrost is warming and thawing, resulting in extensive areas of marked subsidence of the surface. (Hinzman, et. al. 2005. p 262.) This reality is not reflected in the soil section of the Draft EIS (Draft EIS, Chap III, p. 9.).	The third paragraph of Chapter III, section B(3), "Soil Resources," discusses the effects of melting permafrost including development of thermokarsts. However, an additional note and reference have been added to Chapter III, section B(3), "Soil Resources." Osterkamp and Romanovsky (1999) also found that discontinuous permafrost is warming and thawing and extensive areas of thermokarsts terrain are now developing as a result of climatic change.

Letter # - Comment #	Comment	Response
65-112	One of the relatively obvious long-term impacts of the drying of the Arctic is a continued decrease in waterfowl populations that rely on Kobuk and Seward Peninsula wetlands. The draft EIS...does not predict future drops or provide strategies for dealing with the decline.	The RMP provides overarching management prescriptions for BLM land within the planning area. The plan provides enough flexibility to address changing situations. The data is not specific enough to project future drops in waterfowl populations due to drying within the planning area. The plan recognizes that this is a possible future impact (Chapter IV, section G "Cumulative Impacts").
65-113	While the management plan is not the place to set detailed standards for infrastructure, it is the place to acknowledge the need to revise current standards in the face of clear climatic changes. For instance climate change in the Arctic is resulting in increased run-off in glacially-fed rivers and more intense storm events (Hinzman et al. 2005). This suggests that culvert standards which are essential for ensuring fish passage, need to be revised to provide for higher water flows.	The required operating procedures described in Appendix A are designed to adapt to changing site-specific conditions so that protection will still be provided to soil, water, vegetation, fish and wildlife resources. (e.g. ROP FW-2e: "culverts must be designed to avoid restriction of fish passage and adverse effects to natural stream flow."). This allows for site-specific design of culverts which will be based on recent stream flow data.
65-114	White spruce forests, which are the most vulnerable to insects and disease, can be limiting habitat for some songbirds. Black spruce forests, which are most vulnerable to fires when mature, offer climatically optimal conditions for lichen growth because of slow plant succession and little competition from other plant forms. These lichens provide preferred forage for caribou in the winter...the destruction of forage lichens by fire or mechanism may have an immediate effect on the winter range of caribou. In the long run burning of black spruce forests may increase the availability of lichen forage, another factor for land managers to consider.	Only 8% of the planning area supports forest lands and only about half of those land are lichen rich communities. Chapter IV section B.3 of the Proposed RMP/Final EIS discusses impacts of fire on wildlife. The RMP provides the necessary flexibility to adapt fire management to changing conditions.

Letter # - Comment #	Comment	Response
65-115	It is likely that special steps, such as fire fighting in areas traditionally allowed to burn, will be necessary to sustain the remnants of the forests until the transition to new forests has been completed. It is the function of the management plan to address those conflicts and set priorities. To do so, it must begin by acknowledging the likely future loss of forest functions.	Only 8% of the planning area supports forest lands. The Proposed RMP/Final EIS provides the flexibility to adapt fire management to changing climatic conditions and changing fire regimes. The RMP/EIS acknowledges that climate change may result in changes to the vegetative community. It is one of the assumptions for analysis. The transition to new forests is unlikely to occur within the life of the plan.
65-116	The disruption of subsistence activities by climate change suggests that land managers should approach other activities that impact subsistence with caution. Regardless of the choices managers make, the Kobuk-Seward Peninsula management plan must recognize the disruption of subsistence activities in the region and incorporate those impacts into its planning efforts.	While climate change will undoubtedly have some influence on future subsistence use (such as change in season of harvest, changes in species distribution, and access), we don't anticipate a significant increase in the "other activities" that the commenter may be referring to that could impact subsistence (such as hard rock mining, or oil and gas) within the life of this plan. Also, the ROPs and Stips in Appendix A are designed to be adapted to changing conditions.
65-117	In this draft plan, the BLM has chosen to increase the potential nonclimate stressors on wildlife by dramatically increasing the areas available for leasable and locatable mineral exploration within the management area. It is essential that BLM acknowledge the impacts of climate change, the multiplier effect of other stressors, and explain its decision to emphasize mineral development in that context.	Although the Proposed RMP/Final EIS recommends significantly increasing the amount of land open to mineral entry and leasing, the reasonably foreseeable development scenario would result in disturbance of less than 1/10 of one percent of the BLM-managed land. The EIS acknowledges that there would be impacts to wildlife from mineral exploration and development. The impacts to wildlife would be minimal given this level of development.

Letter # - Comment #	Comment	Response
76-1	As written, the current Kobuk-Seward Peninsula plan ignores climate change and the significant impact it is having on people and wildlife in the planning area... There is an overwhelming scientific consensus that climate change is taking place and that it is having impacts on the arctic environment in Alaska and the rest of the world today. According to the Arctic Climate Impact Assessment, "Arctic average temperature has risen at almost twice the rate as the rest of the world in the past few decades. Widespread melting of glaciers and sea ice and rising permafrost temperatures present additional evidence of strong arctic warming." (Arctic Climate Impact Assessment. 2004., p 9. See also Hinzman, et. al. 2005. Evidence and Implications of Recent Climate Change in Northern Alaska and other Arctic Regions. Climatic Change 72: 251-298.)	Additional discussion on climate change has been added to the RMP/EIS both Chapter III and Chapter IV cumulative impacts.
76-2	[I]t is essential that BLM acknowledge the impacts of climate change, the multiplier effect of other stressors, and explain its decision to emphasize mineral development in that context.	Additional discussion on climate change has been added to the RMP/EIS both Chapter III and Chapter IV cumulative impacts.
78-3	There is now enough scientific evidence for federal agencies to acknowledge that climate change is taking place and having impacts on the arctic environment in Alaska. Any management plans must address the impacts of climate change on the region in relation to the different management objectives.	Additional discussion on climate change has been added to the RMP/EIS both Chapter III and Chapter IV cumulative impacts.

Letter # - Comment #	Comment	Response
130-4	Alaska is already seeing the devastating effects of global warming and continued resource development would only make matters worse. Resource extraction leads to additional global warming.	Additional discussion on climate change has been added to the RMP/EIS both Chapter III and Chapter IV cumulative impacts.
197-2	[Climate change must be addressed in the RMP] There is overwhelming scientific evidence that impacts from climate change are having significant effect on the ecology of the area and must not be ignored.	Additional discussion on climate change has been added to the RMP/EIS both Chapter III and Chapter IV cumulative impacts.
245-1	All species are at risk with climate change but those nearest the poles are even at greater risk. It is crucial that we protect habitat now.	Additional discussion on climate change has been added to the RMP/EIS in both Chapter III and Chapter IV cumulative impacts.
86-1	Global warming must continue to be monitored and scientific facts taken seriously by all countries.	Thank you for your comment. BLM agrees.
<b>ROPS AND STIPS</b>		
51-12	The Final RMP/EIS should identify and evaluate the types of research, monitoring, and compliance activities being conducted in the Kobuk-Seward Peninsula Planning Area to ensure that proposed actions, stipulations, and Required Operating Procedures (ROPs) would be effective in providing full protection of sensitive subsistence, cultural, and environmental resources.	The Proposed RMP/Final EIS identifies priority inventory and monitoring activities under each resource. The RMP/EIS allows flexibility to engage in additional research, inventory, and monitoring to address new issues that may arise during the life of the Plan. For permitted activities, BLM will conduct monitoring inspections to ensure compliance with permit stipulations. If monitoring indicates that stipulations or required operating procedures are not effective they can be modified on a project specific basis.
51-13	The Final EIS should discuss what types of monitoring would be conducted to ensure that development activities meet the requirements of the ROPs, oil and gas stipulations, and standard lease terms.	BLM will conduct monitoring inspections of construction, drilling, and rehabilitation operations, through a compliance officer and/or interdisciplinary team, to ensure acceptable attainment of objectives.



Letter # - Comment #	Comment	Response
51-14	<p>The Draft RMP/EIS incorporates a number of ROPs, oil and gas leasing stipulations, and standard lease terms. We recommend that the Final RMP/EIS address additional requirements for the abandonment, removal, and reclamation of activities relating to oil and gas and hard rock mineral and coal mining exploration, development, and operation after leases have expired and operations have ceased. The discussion should identify responsible parties, sources of funding, and the extent to which abandonment, removal, and reclamation would be considered complete. We recommend that general performance criteria for how areas impacted from resource development would be restored and rehabilitated, and any post monitoring, if any, would be required. In addition, the Final RMP/EIS should identify the types of monitoring and corrective actions required to ensure that abandonment, removal, and reclamation actions would be completed.</p>	<p>Oil and Gas leasing stipulation #4 addresses abandonment and expiration of oil and gas leases. Mining of locatable minerals is subject to surface management regulations found in 43 CFR 3809. The Plan defers coal leasing. Reclamation decisions are more appropriately addressed in an implementation level plan when a surface disturbing activity is proposed. This occurs subsequent to the adoption of the RMP/EIS. Before any fluid leasable mineral on-the-ground activity is approved by BLM, the Application for Permit to Drill (APD) must include a 12-point Surface Use Plan of Operation in accordance with the requirements of BLM Onshore Order #1. A reclamation plan is included in the Surface Use Plan of Operations and discusses plans for both interim and final reclamation. Reclamation is required of any surface previously disturbed that is not necessary for continued production operations. A mining plan of operations would have to be approved by BLM before on-the-ground activity associated with locatable mineral development began. Bonding would be required. The mining plan of operations would include proposed reclamation.</p>
58-28	<p>In general, the Working Group favors using fully protective stipulations attached to leases for resource development (e.g. oil/gas or mineral development) as methods to protect and conserve caribou habitats rather than using ROPs as described in the Draft RMP/EIS. We think lease stipulations provide enforceable management and incentives that will minimize actions that might degrade or impair caribou or their habitats.</p>	<p>Thank you for your comment. See response to comment # 65-95 (under Minerals).</p>

Letter # - Comment #	Comment	Response
58-30	Vol. 2 p.A-15 ROP FW-3a. No coal exploration activities between May 20-August 15. No coal exploration between August 16-May 19 when caribou are present in the exploration area. These ROPs should be required in areas outside of the core habitats defined above. No development should occur in the core seasonal habitats.	Thank you for your comment. See response to comment # 197-9 (under Wildlife).
58-31	Vol.2 pg A-15, ROP FW-3d. Aircraft flights for exploration and development activities should be conducted at least 2,000 ft AGL (except for take-offs and landings). No harrassment of wildlife by low flying aircraft during exploration activities. Aircraft restrictions for the Planning Area should not adversely affect the flights of guides and transporters authorized to work in the Planning Area. These ROPs should be required in areas outside of the core habitats defined above. No development should occur in the core seasonal habitats. Aircraft altitude restrictions should be written in a manner that is enforceable. The cloud ceilings on the calving ground during the critical period is rarely 2,000 ft. or higher. "Safe flying practices" would require pilots to stay free of clouds unless flying under instrument flight rules which is not likely for development operations in this area. The "exception" noted in this ROP would likely be more common than the rule. A ceiling minimum should be set (1,500 ft). If safe flight conditions can not be maintained at or above that altitude they should not be permitted.	This comment discusses two separate required operating procedures (ROPs). In relation to the concern about guides, ROP FW-3d has been revised to state "Within defined WAH insect relief areas, aircraft associated with development activities shall maintain an altitude of at least 2,000 feet AGL (except for takeoffs and landings) from June 20-August 15, unless doing so would endanger human life or violate safe flying practices." In regard to ROP FW-3c which pertains to calving areas, this ROP was adopted to be consistent with the adjacent National Petroleum Reserve-Alaska. The stipulation includes the exception: "unless doing so would endanger human life or violate safe flying practices," to address the safety issue raised by the commenter. We believe the 2,000-foot limit was developed based on Technical Report No. 86-3 (Schideler 1986) which reviewed studies on the effects of aircraft overflights on caribou. In almost all studies, aircraft maintaining flight altitudes of 2,000 feet above ground level caused little or no disturbance to caribou.

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58-39	Outside of the core habitat protection areas...strong stipulations should be developed (in collaboration with caribou managers and scientists from state and federal agencies and universities) similar to those on the North Slope in order to minimize impacts to caribou.	The oil and gas leasing stipulations and required operating procedures (ROPs) in Appendix A were adapted from the ROPs and Stips developed for the North Slope.
58-48	In writing management stipulations to mitigate potential impacts on caribou or their habitats, the Draft RMP/EIS should not allow exception clauses that weaken conservation stipulations. The Authorized Officer should not be allowed to waive Required Operating Procedures or stipulations.	Before surface disturbing activities are approved, the BLM must prepare an environmental assessment (EA) or EIS, if necessary, of the potential effects of the proposed activity on the natural and socio-economic environment of the affected area. Any changes made to a ROP will be addressed in the EA or EIS. The objective of the subject ROP will remain unchanged. Oil and gas lease stipulations include criteria for waivers, exceptions, and modifications. If the BLM Authorized Officer determines that a stipulation involves an issue of major concern, modifications, waivers and exceptions of the stipulation will be subject to at least a 30-day advance public review (43 CFR 3101.1-4).
64-14	Pages 2-53 and 2-54, Solid Leasable Minerals, Alternatives C and D. As mentioned ...in comments regarding p.2-41 to 43 [fluid leasable minerals], we recommend including and using Required Operating Procedures (ROPs) and Stipulations (Stips) along the specified rivers to protect riparian habitat as appropriate. In the southern Nulato Hills, riparian corridors provide valuable winter habitat for the Western Arctic caribou herd that would benefit from ROPs and Stips designed to protect habitat for winter use by caribou.	The ROPs apply to all permitted activities and unless specifically noted in the ROP, apply to the entire planning area. Many of the ROPs are designed to protect riparian habitat and would apply to activities permitted in the Nulato Hills.

Letter # - Comment #	Comment	Response
64-13	<p>We request the Bureau include provisions with the ROPS and Stips that provide the necessary flexibility along the specified rivers to protect valuable riparian habitat where necessary. Given NEPA requirements and the ability to impose ROPS and Stips on development activities, a statement to the effect that the value of prime riparian habitat will be considered for protection and mitigation in the development of any mineral resources that may impact riparian resources would allow site-specific impacts to be addressed through the application of appropriate constraints and mitigation. Riparian habitat would be protected taking into consideration the characteristics of a particular site and resource development could occur provided appropriate mitigation and/or setbacks are imposed. In some instances, 300 feet may be appropriate protection for riparian habitat, in some instances, a smaller setback may provide adequate protection, and in some instances a larger setback may be required. [Pgs. 2-41 to 2-43, 2-60, 2-136]</p>	<p>Several additional ROPs have been developed to protect riparian vegetation and aquatic habitats (Appendix A). Activities occurring within 300 feet or the flood-prone width of high value rivers could not occur unless the claimant, operator, or applicant proposing to use or develop this area can demonstrate that such use or development will not adversely alter the condition and ecological function of aquatic and riparian systems or diminish the quality and diversity of habitats needed to sustain the production of fish and wildlife populations at their natural potential. See Appendix A, section B(3) and B(5).</p>
64-59	<p>Rather than creating a 300-foot setback on both sides of the Ungalik River, we request that BLM consider alternative means of managing the portion of the Ungalik River south of T8S R9W, Kateel River Meridian such as ROPS and Stips designed to protect valuable habitat.</p>	<p>Additional Required Operating Procedures have been developed to manage the Ungalik River. See Appendix A, section B(5).</p>
65-96	<p>BLM failed to identify the most relevant mitigation measures. Nowhere did BLM attempt to analyze the effectiveness of the stipulations and ROPs or explain how they were developed.</p>	<p>See response to comment # 65-37. Additional text was added to Appendix A, explaining how the Stips and ROPs were developed.</p>

Letter # - Comment #	Comment	Response
65-100	Authorized Officer should not be allowed to waive ROPs or stipulations. An additional public process should be conducted if industry asks BLM to change their ROPs and Stips and if the changes are likely to affect critical habitat or subsistence user areas, key stakeholders in the region must be consulted regarding the changes.	If BLM determines that a stipulation involves an issue of major concern, modifications, waivers and exceptions of the stipulation will be subject to at least a 30-day advance public review (43 CFR 3101.1-4). See response to comment # 58-48.
65-101	Dismantling, Removal and Restoration (DR&R) requirements must be added to the Final RMP/EIS. BLM has yet to develop specific DR&R requirements to meet its overall obligation of returning the disturbed land to its previous primary uses as fish and wildlife habitat and for subsistence uses by native villagers. Thresholds must be identified for specific management actions as well as development of a monitoring and assessment plan.	Reclamation decisions are more appropriately addressed in an implementation level plan when a surface disturbing activity is proposed. See response to comment # 58-51.
65-102	ROP FW-3a. Coal exploration activities should be limited to between May 20-August 15. Coal exploration between August 16-May 19 should not be allowed.	ROP FW-3a limits coal exploration within caribou calving and insect relief habitats during the most critical time period, May 20- August 15. Coal exploration would be allowed in these areas after caribou disperse into other habitats.
65-103	ROP FW-3d. Aircraft flights for exploration and development activities should be conducted at least 2,000 ft AGL (except for take-offs and landings). During exploration activities, low flying aircrafts should not be allowed to harass wildlife. ROP [FW-3d] should identify how it will be enforced.	Mitigation measures (ROPs), developed through this RMP/EIS process, are required, and therefore, enforceable. Compliance with the ROPs would be determined through monitoring of individual projects. Harassment of wildlife by low flying aircraft is illegal.

Letter # - Comment #	Comment	Response
	65-105	These ROPs [FW-3d and FW-3a] should apply all lands outside ACECs which should prohibit industrial activities, and absolutely no development activities should be allowed in areas identified by ADF&G as core habitats for the WACH.
197-22	Any rights-of-way, ROPs, Stipulations and permitting must ensure that critical habitat for moose, fish, caribou, and other subsistence resources be afforded all possible protection that can be instituted, if it means seasonal restrictions or avoidance areas, so be it.	The ROPs and Oil and Gas Leasing Stipulations were designed to protect the resources the commenter refers to.
198-10	The ROPs applicable to subsistence (Appendix A-17) require only that "permittees may be required to provide information to potentially affected subsistence communities" and that "permittees may be required to consult with potentially affected subsistence communities." Providing information and consulting with people are simply not enough to ensure that there will not be adverse affects to subsistence arising out of the development that will be allowed under either Alternative B or D.	BLM has used this same stipulation language in other areas of the State to great effect. The consultation requirements described within this overarching programmatic stipulation/ROP ensures that communities will interact with permittees, and play an active role in helping to shape the project to cause the least amount of impact to subsistence uses and resources in their particular area. The RMP/EIS acknowledges that there will be some unavoidable impacts to subsistence. In addition to the ROPs mentioned by the commenter, ROP Sub -1a states that "In order to eliminate, minimize, or limit effects of permitted activities on subsistence use, BLM may recommend modifications to proposed activity..." For every individual project or request for permitted activity, an ANILCA 810 evaluation will be completed, and additional mitigation measures that serve to minimize project-specific identified impacts will be applied. ROPs under other programs also serve to protect fish and wildlife, and their habitats to the subsistence user's benefit.
198-17	The ROPs for Fish and Wildlife (Appendix A-15 and 16) only pertain to pipeline construction.	The ROPs for Fish and Wildlife do not only pertain to pipeline construction. They apply to a variety of permitted uses. ROP FW-4b pertains to the design of roads and pipelines to allow for free movement of wildlife and unimpeded passage of subsistence users.
<b>EDITORIAL CHANGES</b>		
1-10	The Reference on page 18 is unreadable.	We were unable to find the reference referred to.
52-11	Pg. 2-60 (d) Alternative B, 3rd line: "regulations is misspelled.	This correction has been made in the Proposed RMP/Final EIS

Letter # - Comment #	Comment	Response
52-32	Pg. 3-173-4. Imnachuk HLMP: "unencumbered" is misspelled.	This correction has been made in the Proposed RMP/Final EIS
52-33	p. 3-175 - Southern Seward Peninsula Region, last sentence: "Peninsula" is misspelled.	This correction has been made in the Proposed RMP/Final EIS.
52-39	p.3-193 - mid page incomplete sentence: "These placer gold occurrences are generally restricted <b>to?</b> the schist bedrock.	This correction has been made in the Proposed RMP/Final EIS
52-40	Pg. 3-194 (g) 1st sentence: "...in the planning area include a limestone ...."	This correction has been made in the Proposed RMP/Final EIS
52-46	Pg. 3-243. (2) Key Elements 3rd bullet: insert "be" after designation.	This correction has been made in the Proposed RMP/Final EIS
52-47	Pg. 3-244 c) last paragraph, line 10: replace "to" with do.	This correction has been made in the Proposed RMP/Final EIS
64-38	Pg. 3-224 c) Biomass: Edit first sentence to remove duplicative text.	This correction has been made in the Proposed RMP/Final EIS
64-39	Pg. 3-236 1) Background third bullet: Change plan to "plant".	This correction has been made in the Proposed RMP/Final EIS
64-45	Pg. 4-24, last sentence: delete the word "within"	This correction has been made in the Proposed RMP/Final EIS
64-46	Pg. 4-126 First and second paragraphs, grammatical errors: Line 9: "...to take place on non-BLM managed...;" Line 2, pp2, change "to" to "in"; "could increase interest in exploration on...;" Line 5/6: "This would result in the displacement of mineral activities to..."	This correction has been made in the Proposed RMP/Final EIS
64-57	Include VABM in list of Acronyms	VABM was added to the list of acronyms.

## E. Index of Comment Letter Numbers

Below is a list of names of those who commented on the Draft Kobuk-Seward Peninsula RMP/EIS and their assigned comment letter number. Also shown are the page numbers where responses to their specific comments can be found. Letters which contained no substantive comments are marked as such. 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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Artley, Richard	0219	*No Substantive Comment
Ashenfelter, Jack H.	0123	*No Substantive Comment
Bailey, Edna	0084	*No Substantive Comment
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Barker, Daniel	0216	J-107
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Evans, Dinda	0006	*No Substantive Comment
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