

Squirrel River Management Plan Scoping Report

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TABLE OF CONTENTS

I.	Introduction.....	3
	A. Overview, Purpose, and Need for the Squirrel River Management Plan.....	3
	B. Description of the Planning Area.....	3
	C. Description of the Scoping Process.....	6
	D. Cooperating Agencies/Invitees.....	6
	E. Government to Government Consultation.....	7
	F. Media.....	7
	G. BLM Resource Advisory Council.....	7
II.	Comment and Issue Summary.....	8
	A. Issues Identified During Scoping.....	8
	B. Summary of Public Comments.....	8
	C. Issues Raised During Scoping That Will Not be Addressed.....	12
	D. Decisions to be Made.....	13
	E. Valid Existing Management to be Carried Forward.....	14
III.	Planning Criteria.....	15
IV.	Data Summary and Data Gaps.....	16
V.	Summary of Future Steps in the Planning Process.....	16
VI.	Opportunities for Public Participation.....	17
VII.	Scoping Comments.....	18

I. Introduction

A. Overview, Purpose, and Need for the Squirrel River Management Plan

The Central Yukon Field Office (CYFO) of the Bureau of Land Management (BLM) is preparing the Kobuk-Seward Resource Management Plan Amendment and Environmental Assessment for the Squirrel River Management Plan (Squirrel River Management Plan). The Kobuk-Seward Peninsula Resource Management Plan (KSP/RMP) developed management objectives for the Squirrel River area, but directed in the Record of Decision (ROD) that implementation plan-level decisions would be made in a separate Squirrel River Special Recreation Management Area (SRMA) plan. Key issues for this plan, previously identified by the BLM, include outdoor recreation, subsistence, commercial and guiding.

Subsequently, BLM issued new recreation planning guidance and travel management guidance that made it apparent the area's designation as a Special Recreation Management Area may not be helpful or accurate. It now appears that the area is more properly described as a critical subsistence use area. Therefore, BLM is proposing to amend the RMP to change the SRMA designation.

There is a history of interest surrounding management of the Squirrel River area. In the 1990s, the Squirrel River Integrated Activity Plan was developed by the BLM. Additionally, a review of the Squirrel River's suitability for inclusion into the National Wild and Scenic River System was completed in 1999¹. The BLM will use some of the information contained in these previous documents for the development of the Squirrel River Management Plan.

The KSP/RMP and ROD contained one implementation-level decision related to the Squirrel River SRMA. In this decision, air taxi operators and transporters would be required to obtain commercial permits to operate in the Squirrel River SRMA. The Squirrel River Management Plan will contain two kinds of decisions: (1) land use plan-level decisions and (2) implementation plan-level decisions.

Subsistence hunters have stated that there are too many guided and transported hunters in the Squirrel River SRMA, which has resulted in caribou not migrating when and where they have traditionally. This has resulted in a decrease in caribou and moose available for subsistence hunting. In addition, the use of off-highway vehicles by commercial hunters is increasing, causing long-term damage to the tundra. The decisions made in the Squirrel River Management Plan will attempt to reduce user conflicts and address subsistence concerns. A range of alternatives will be developed to respond to these issues.

The range of alternatives developed for the Squirrel River Management Plan will be analyzed in an Environmental Assessment (EA). This EA will propose various alternative management strategies and will assess the effects of each management alternative on resources within the

¹ The Record of Decision Squirrel River Wild and Scenic River Suitability Study completed by the BLM, signed September 23, 1999, found the Squirrel River unsuitable for inclusion in the National Wild and Scenic River System.

planning area. The range of alternatives will be limited to recreation and travel management issues, pertaining only to BLM-managed lands within the Squirrel River SRMA boundary.

B. Description of the Planning Area

The Squirrel River SRMA planning area consists of approximately 656,000 acres of public lands in northwest Alaska. The planning area includes all BLM-administered lands in the Squirrel River SRMA. Of the 656,000 acres of public land in the planning area, approximately 446,000 acres are unencumbered lands and 209,000 acres are selected lands managed by the BLM. The BLM will manage these selected lands until conveyance of the lands occurs. The planning area is bounded on the north, west, and east by lands managed by the National Park Service and on the south by Native selected and Interim Conveyed lands.

There are no communities with the Squirrel River SRMA planning area, however the Native villages of Kiana, Noatak, Kotzebue, and Noorvik utilize the area for subsistence use. The majority of the lands within the planning area are roadless.

Table 1. Land Status Within the Squirrel River Planning Area

Land Status	Acres
BLM (unencumbered)	446,000
Native-selected lands	20,000
State-selected lands	189,000
Native Allotments	1,000

Notes: All acres rounded to the nearest 1,000 acres. Acreages represent surface acres only. Table does not represent the sum total of the 23 million acre planning area. No warranty is made by BLM as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. For official land status and boundary information, refer to cadastral survey plats, master title plats, and land status case files.

C. Description of the Scoping Process

A Notice of Intent (NOI) to prepare the Squirrel River Management Plan, which initiated the scoping period, was published in the Federal Register on May 13, 2010. The scoping period ran from May 2010 to the end of December 2010. During this scoping period, public scoping meetings were held in the communities of Anchorage, Fairbanks, Kiana, Kotzebue, and Noorvik.

The purpose of each meeting was to introduce the public to the BLM planning process and the Squirrel River Management Plan. Information presented at the meetings included:

- The purpose for preparing the Squirrel River Management Plan.
- Boundaries of the planning area and the relationship to BLM-managed lands.
- The planning schedule.
- Planning criteria.
- A framework for the plan.
- Specific examples of decisions that might be made in the plan.

The format of each meeting was an open house. The CYFO Field Manager and members of the Squirrel River Management Plan interdisciplinary team attended each meeting to present information regarding the plan, to answer any questions from the public, and to elicit public comment on the planning criterion for BLM-managed lands within the planning area. Maps of the planning area were available at each meeting for review. A general land status map of the planning area and comment forms for the public were available at each meeting.

Additionally, during the scoping period, the BLM developed a Squirrel River Management Plan website. The website describes the schedule of public scoping meetings, information on the planning process, links to BLM documents, including the NOI and all KSP/RMP documents, and information on how to participate during the planning process. All planning-related documents, including this Scoping Report, will be available through the Squirrel River Management Plan website.

D. Cooperating Agencies/Invitees

Cooperating Agency status provides a formal framework for governmental units, whether local, state, Tribal, or Federal, to engage in active collaboration with the lead Federal agency to implement the requirements of the National Environmental Policy Act (NEPA). Agencies and Native villages with interest and/or special expertise in the Squirrel River planning area were invited to become Cooperating Agencies in the planning process. In 2010, letters were mailed to following entities requesting their input and participation:

Native Village of Kiana
Native Village of Kotzebue
Noorvik Native Community
Northwest Arctic Borough
State of Alaska

Of the contacted agencies and Native villages, only the Northwest Arctic Borough agreed to participate as a Cooperating Agency with the BLM during the development of the Squirrel River Management Plan. A Memorandum of Understanding formalizing the Cooperating Agency agreement between the BLM and the Northwest Arctic Borough was signed in January 2011.

E. Government to Government Consultation

Federally-recognized Tribes have a special, unique legal and political relationship with the Federal Government as defined by treaties, statutes, court decisions, executive orders, and the U.S. Constitution. These definitive authorities also serve as the basis for the Federal Government's obligation to acknowledge the status of Federally-recognized Tribes in Alaska. As such, it is the policy of the BLM to formally consult with Federally-recognized Tribes in Alaska prior to taking action or undertaking activities that will have a substantial and direct effect on the Tribes, their assets, rights, services, or programs. In 2010, letters requesting government-to-government consultation were sent to the four Federally-recognized Tribes within the planning area. Consultation will provide input from Alaska Natives and Tribes. These groups may provide additional data on Traditional Cultural Properties and subsistence uses in the planning area. Traditional councils outside of the planning area, whose Tribal members use BLM lands within the planning area for subsistence use, are also being consulted. Tribal entities contacted include:

Native Village of Kiana
Native Village of Kotzebue
Noorvik Native Community
NANA Regional Corporation, Successor in Interest to Noatak
Napaaktukmeut Corporation

F. Media

Use of local media is essential in providing adequate public notice for the varying stages of the planning process. Radio and print media of local and statewide circulation were used to disseminate information concerning the schedule of scoping meetings. The BLM has utilized the following radio stations and newspapers for announcements of public scoping meetings:

Anchorage Daily News
Fairbanks Daily News-Miner
KOTZ Radio, Kotzebue, Alaska

G. BLM Resource Advisory Council

The BLM-Alaska Resource Advisory Council (RAC), which advises the BLM State Director and makes recommendations to the BLM District and Field Managers, will provide a broad spectrum of input from various interests. The RAC has been informed of the beginning of the Squirrel River Management Plan. Opportunities for input will continue to be made available at RAC meetings and throughout the planning process.

II. Comment and Issue Summary

A. Issues Identified During Scoping

The majority of comments received focused on two main issues: subsistence use verses commercial use and Special Recreation Permit (SRP) management decisions. Issues surrounding the impact of commercial uses, such as guide and transporter use, on subsistence use were commented on in support or opposition of potential regulatory management of the Squirrel River SRMA. SRP management decisions were also identified as an issue that should be addressed to assist in resolving the user conflict issues surrounding the planning area.

Comments were also received on other topics, including special designations, travel management, climate change, fish and wildlife, minerals, planning, and various other topics.

B. Summary of Public Comments

This section summarizes public comments that were received in response to scoping, including those provided at scoping meetings and those submitted in writing. For a full listing of scoping comments see Section VII, Scoping Comments, on page 18.

Throughout the public scoping period, approximately 80 comments were received related to the Squirrel River Management Plan. Comments were analyzed in detail and resulted in the identification of planning issues that will be addressed during the development of alternatives. An issue is defined as a matter of controversy or dispute over resource management activities or land use that is well defined or topically discrete, and has alternatives between which to decide.

The following sections summarize the comments received. The summaries are categorized by issue.

1. Subsistence

Approximately half of the comments received during the public scoping period were related to subsistence use and subsistence management. Several comments encouraged managing for subsistence use over commercial use, while others stated that no real user conflict exists between subsistence users and commercial users in the Squirrel River planning area. In general, the non-local community desires continued access and no additional restrictions on commercial use of the Squirrel River SRMA, while the local communities has concerns over impacts to subsistence activities from the increased recreational and sport hunting activities in the area. The following are samples of the comments received relating to subsistence.

Some comments supporting subsistence use include:

“There’s a lot of hunters and recreational people too. Hunters were in plans and doing different things. Some of us think that’s affecting the migration of the caribou, some don’t but we’re all told by our elders that if you’ll hunt ahead of the herd, the first of the herd, it will always change the migration.”

“We’ve had caribou come by here for years and I can say for years because I’ve witnessed it, I’ve seen it. We all know it, even run past by the village. We used to see that and now, you know, we’re looking beyond the horizon and, you know, they’re going a different route now and we’re talking about that very land where they used to come by right there. We’re wanting to regulate it so I hope, you know, because of the Tide Lake, you know, rural preference, that this plan would recognize those migration routes for caribou and enforce those routes because we can’t control the airplanes, you know, and they’re a factor too. You know, when they’re flying up in the Squirrel area, they can turn the migration route.”

“We don’t have the luxury of chartering an airplane and going up there and do hunting... Fall hunting is very important. I would comment that in your plan, to really make a consideration of our people’s subsistence use in this area, caribou is very important for our people.”

“There’s a lot of conflict that comes up, you know, between sports fishermen and sports hunters and subsistence hunters.”

“Subsistence continue needs to be the priority of this plan.”

Some comments supporting commercial uses include:

“There’s not any more traditional customary in Alaska than air taxis having broad latitude to come and go wherever it was safe to operate.”

“I can’t find anyplace in ANILCA where subsistence users are protected.”

“There’s no subsistence, no biological issue, no habitat issue.”

“If there’s ever a determination that there is a biological or ecological need to restrict the number of users, it only makes sense to -- you know, on federal land to make it fair and equal.”

2. Travel Management and Off-Highway Vehicle Management

Seven comments were received regarding travel management and Off-Highway Vehicles (OHVs). Of these comments, a few discussed traditional use routes used by individuals living in the communities surrounding the Squirrel River planning area. It was noted that the Squirrel River watershed has traditionally been used as a route between Kiana and Noatak, because of the low passes through the mountains. One comment suggested BLM place no transportation restrictions on the planning area, due to use its traditional use.

Other travel management comments focused on monitoring OHV routes and usage. One commenter asked the BLM to “establish your baseline on the vehicle tracks and figure out a mechanism to keep track of that, because in the tundra those tracks will last forever...” Another comment suggested developing a system to monitor and track OHV use and determine the acceptable use levels for the planning area.

A few comments were also received regarding travel management and OHV restrictions developed in the plan. The common theme of these comments involved potential restrictions BLM may place on travel methods and OHV use. One comment asked if BLM was going to restrict air-boat use, while another asked if BLM would limit the number of vehicles transporters and guides can use in the Squirrel River SRMA.

3. Special Recreation Permits

Restrictions associated with Special Recreation Permits (SRP) were addressed in several comments during the public scoping meetings. The issues discussed included permit timing, camp restrictions, tracking and reporting requirements, local guide preference, and eliminating all guide permits.

Transporter and guide permit timing was the most frequently addressed issue related to SRPs. Several individuals suggested BLM develop a timing restriction for guide and transporter SRPs. One comment said BLM should “create a [later] date for [guides] to open up their area and not go with the State hunting regulations” Another comment suggested BLM only allow guides and transporters to operate on certain days and during certain times, with possibly a shorter season than the subsistence hunters. Establishing caribou escapement goals was also suggested by one individual. The commenter stated that if “you let the lead caribou go through, the rest of the herd will go through the scent trail...and they will follow the leaders.”

Other comments addressing SRPs included placing camp restrictions and tracking and reporting requirements in the SRPs. One comment called for a permit criteria for no-trace camping and minimization of noise disturbance. Another comment suggested SRPs include requirements that guides and transporters track their clients and report on where clients are located.

4. Special Designations – SRMA Designations

Two comments addressed special designations of the Squirrel River planning area. The first comment discussed the Squirrel River Wild and Scenic River Report and how the goal of that report was to bring more people in to float the river, but if the Squirrel River is designated a SRMA that will also bring people in. The second comment stated that the Squirrel River should not be a SRMA, because the last few miles of the river are very shallow, making it difficult to access with a motorized boat.

5. Climate Change

The issue of climate change was raised in multiple comments. One comment stated that climate change may be influencing the traditional migratory route of the caribou and such influence should be considered in this plan. Another comment discussed how Alaska Department of Fish and Game is the agency setting the hunting regulations, but the timing of the hunt may need to change due to climate change. It was suggested BLM use this plan to create a baseline process for dealing with the conflict between the hunting regulations and the actual behavior and availability of the caribou to manage the area for the benefit of subsistence use.

6. Fish and Wildlife

Most comments regarding wildlife were directly related to the caribou population and caribou habitat. Several comments discussed the need to identify a primary caribou migration corridor, which could be used as a management boundary for restricting or allowing certain commercial uses. Another comment suggested the BLM distribute maps containing information on the Western Arctic Caribou Herd to all interested parties, which might document changes in caribou migration, habitat, and behavior.

Fish were specifically discussed in only one comment. The commenter stated “I don’t know if there’s issues having to do with fish and fishing management and the protection of water quality, ...[but] just the quality of the river might be appropriate to address.”

7. Minerals

One comment was received regarding minerals and mineral entry. The comment specifically opposed the lifting of Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) withdrawals, which removed lands from public entry to allow for Native selection of such lands, with the planning area.

8. Planning

Several comments were received on the overall planning process for this planning effort. The comments ranged in variety, addressing several aspects of the planning process. Some of the issues discussed included Cooperating Agencies, Alaska National Interest Lands Conservations Act (ANILCA) 810 Hearings, plan revisions, and benefits based management.

Two comments addressed BLM’s Cooperating Agency status with other agencies. Specifically one commenter pointed out that many lands with the Squirrel River corridor are selected by the State of Alaska, yet the State is not a Cooperating Agency. Another comment suggested BLM contact any Federal subsistence advisory committees that may have an interest in the plan.

It was also suggested that BLM conduct ANILCA 810 hearings “even if you don’t get the three indicators that you need in order to say okay, let’s do the 810 hearings...” Another comment suggested that BLM revisit this plan every five or ten years, in order to review the management decisions made and determine if they are still working.

The benefits based management planning approach was discussed in multiple comments received during the scoping period. All of these comments questioned the benefits based management planning process. Specifically commenters stated that the process leads to opinionated decision making, instead of scientific decision making. One commenter stated “How do you do that, good beer versus bad beer?...The person[al] taste of an individual defines what beer they like to taste. The personal values of the individual define what is a quality hunt

and what is not a quality hunt and if you're going to restrict access based on your opinion of what is high quality and what is not...you're just going down a never ending conflict.”

9. Other Issues

Other comments were received that do not address one of the resource issues specified above. These comments include:

A comment was made suggesting BLM put a pay phone somewhere in the planning area. One commenter asked if the BLM could open a field office in Kiana. Another comment asked if BLM could create ranger positions to patrol the Squirrel River.

C. Issues Raised During Scoping That Will Not be Addressed

Climate change and mineral entry are outside the scope of this planning effort and will not be addressed. Both topics have been addressed in the KSP/RMP.

The issue of climate change was recognized and previously addressed in the KSP/RMP in Chapter IV, pages 4-3 through 4-252. The KSP/RMP says:

“Alaska is experiencing significant effects of global climate change, including warmer temperatures, melting glaciers, reduction of pack ice, and changes to its vegetative communities (see Hansen et al., 1999; Barber et al., 2000; Oechel et al., 2000; Serreze et al., 2000; Goetz et al., 2005 and numerous others). Additional potential effects of global climate change in Alaska include increased precipitation, decreased snow cover, rising river flows, rising of sea level, thawing of permafrost, changes in fire frequency and severity, an ice-free shipping lane from Europe to Asia across the Arctic Ocean, changes in wetlands, and shifts in the distribution of wildlife (ACIA 2004). Over the past few decades, average temperature in the Arctic has risen at almost twice the rate as the rest of the world (ACIA 2004). From 1949 to 2005, average annual temperature at Kotzebue and Nome has increased by 3.3°F and 3.2°F respectively (Alaska Climate Research Center 2006). The majority of the warming trend has come during the winter months, where temperatures have increased by 7.2°F and 5.2°F in Kotzebue and Nome, respectively (Alaska Climate Research Center 2006). Most models project that rapid Arctic warming will continue.

These changes will have substantial direct and indirect impacts on people living in the region. For example, coastal erosion from storm surges may be exacerbated due to thawing of permafrost, reduced sea ice extent, and later formation of shore-fast ice. This combined with rising sea levels make it likely that entire towns, such as Kivalina, will have to be abandoned and relocated elsewhere. Villages are already taking these problems into account. The newer buildings in Teller were constructed away from the town center on higher ground to the southeast. This phenomenon has also had direct effects on the oil industry.

Another predicted result of climate change is a shift in vegetation. Projections are that the amount of tundra would shrink to its lowest extent in at least the last 21,000 years (ACIA 2004). Mosses and lichens are among the groups expected to decline as warming increases (ACIA 2004). The timeframe of these shifts will vary. Where suitable soils and other conditions do not exist, changes are likely a century away. However, significant changes in Arctic communities over the past few decades have already been documented (e.g., Sturm et al. 2001).”

The issue of mineral entry was also discussed throughout the KSP/RMP and decisions were made applicable to the entire KSP/RMP planning area. The planning criteria for the Squirrel River Management Plan limit decisions to made for the Squirrel River SRMA to recreation and travel management.

D. Decisions to be Made

The public comments received during the scoping processes for the Squirrel River Management Plan will help shape the final decisions made by the BLM for the planning area. All decisions made in the Squirrel River Management Plan will consider potential conflicts with subsistence use of the planning area. Additionally, Federal subsistence responsibilities and State of Alaska wildlife management strategies will need to be considered and balanced with the decisions made in this management plan.

The decisions made in the Squirrel River Management Plan will only apply to recreation and travel management (in accordance with the KSP/RMP ROD) on BLM-managed lands within the Squirrel River SRMA boundary. All other decisions made in the KSP/RMP will remain unchanged. The Squirrel River Management Plan will contain two kinds of decisions: (1) land use plan-level decisions and (2) implementation plan-level decisions. The Decision Record will identify and segregate the land use plan-level decisions from the implementation plan-level decisions. The Squirrel River Management plan will make the following decisions:

1. Land Use Plan-Level Decisions –
 - a. Reconsider the SRMA Designation for the Squirrel River. The Squirrel River Plan may classify the Squirrel River planning area as a SRMA, an Extensive Recreation Management Area (ERMA) or as “Other” lands.
 - i. If the Squirrel River is designated as “Other” lands the Decision Record will:
 1. Identify primary uses of the land and manage for recreation uses that are not in conflict with the primary uses.
 2. Address visitor health and safety, resource protection, and user conflict.
 3. Identify which activities require special recreation permits.
 4. Identify mitigation necessary to reduce recreation impacts on cultural and natural resources.
2. Implementation Plan-Level Decisions -

- a. Make necessary management decisions, such as identifying the desired user numbers and the actions necessary to reduce user numbers if they are currently above the desired level.
- b. Make administrative permitting decisions, including:
 - i. Establishing due dates for permit applications.
 - ii. Establishing a competitive process for permitting.
 - iii. Considering a joint selection process with the State of Alaska.
 - iv. Establishing clientele limits for permits.
 - v. Establishing minimum camp-to-camp distances for permit holders.
- c. Make information and education decisions, including establishing outreach efforts, such as brochures or surveys, to assist in monitoring user satisfaction.
- d. Make monitoring decisions, including establishing a monitoring scheme to administer the user conflict.

Land-use planning decisions are subject to the protest process. Implementation plan-level decisions may not be protested, however they are appealable. Directions will be given in the Decision Record describing the protest and appeal processes.

E. Valid Existing Management to be Carried Forward

All management decisions made in the KSP/RMP ROD will remain in existence and will be carried forward, unless they are specifically addressed in the Squirrel River Management Plan. The KSP/RMP ROD contained only one implementation-level decision related to the Squirrel River SRMA. In this decision, air taxi operators and transporters would be required to obtain commercial permits to operate in the Squirrel River SRMA. The Squirrel River Management Plan will uphold this decision and will make further management decisions for the Squirrel River SRMA. All decisions made in the Squirrel River Management Plan will pertain only to the BLM-administered lands within the Squirrel River SRMA.

III. Planning Criteria

This land use plan amendment and EA will only focus on the decisions required for the Squirrel River SRMA. All other decisions made in the KSP/RMP will remain unchanged. The following planning criteria will help guide the land use planning process for the Squirrel River Management Plan.

The BLM planning regulations found in 43 CFR 1610 require preparation of planning criteria to guide the development of RMPs and RMP amendments. Planning criteria provide the constraints used by the planning team as it develops the plan's alternatives and ultimately selects the preferred alternative. They also ensure that the RMP is tailored to the issues identified by the BLM through public participation. They are designed to avoid unnecessary data collection and analysis.

Planning criteria are based on the applicable laws and regulations providing agency guidance as well as consultation and coordination with a wide variety of participating agencies and entities. They are also based on the analysis of pertinent information and the professional judgment of the planning team.

Planning criteria may be amended, supplemented, or changed as the need dictates. The following planning criteria were developed internally and were presented to the public during the public scoping process for this planning effort:

1. Opportunities for public participation will be available throughout the RMP Amendment process.
2. Valid existing rights will be recognized and protected.
3. Subsistence uses will be considered and adverse impacts minimized in accordance with Title VIII, of ANILCA.
4. BLM will work cooperatively with the State and Federal agencies, Native corporations, Tribes, Municipal governments, interested groups and individuals.
5. Decisions reached in this amendment will consider and adhere to Alaska Department of Fish and Game (ADF&G) objectives.
6. This plan amendment will conform to the BLM's H-1601-1 Land Use Planning handbook as well as FLPMA, NEPA, CEQ, ANILCA, and other Federal laws, regulations, and policies as required.
7. Decisions will be consistent with the Alaska Land Health Standards.
8. Route designations for Off-Highway Vehicles for all public lands within the Squirrel River SRMA will be completed according to the regulations found in 43 CFR 8342.
9. The plan will address only the lands within the Squirrel River SRMA which are managed by BLM.
10. The plan will only make recreation and travel management decisions as outlined in the BLM Land Use Planning Handbook. All other decisions made in the KSP/RMP will remain in effect.
11. BLM will incorporate Environmental Justice considerations into this amendment to adequately respond to Environmental Justice issues facing minority populations, low income communities, and Tribes living near public lands and using public land resources.

IV. Data Summary and Data Gaps

The CYFO staff has identified data and corresponding geographic information system (GIS) products required to effectively analyze the environmental impacts associated with each alternative. Resource information available in the Fairbanks District Office will be used in formulating recreation objectives and recreation and travel management actions. Data from the State of Alaska, other Federal agencies and other approved sources of data will be compiled and utilized.

Most of the existing data was been updated, compiled, and digitized during the completion of the KSP/RMP and will be used for planning effort. GIS themes provide the building blocks used to

qualify resources, create maps, and manipulate scenarios during the development of the alternatives.

In addition to the existing information, new data (e.g., current visitor use information, existing trails information, etc.) will be needed for the Squirrel River planning area to ensure adequate baseline information is available for such resources. The BLM expects to compile the majority of this information from existing sources. The BLM has some data on the number of visitors in the area that are guided, as all guides are required to obtain a permit from the BLM to use the area. Most of the existing trails data is on various photographs that need to be compiled, verified and mapped. Any new data will be in a GIS compliant format.

V. Summary of Future Steps in the Planning Process

The future planning process will consist of the following steps:

1. Formulate the Alternatives. Alternatives will be formulated by identifying a range of resource objectives and management practices that will address the issues. A no-action alternative will also be included. Alternatives will be developed for the Squirrel River Management Plan in 2011.
2. Analyze the Effects of the Alternatives. Once the alternatives are developed, the effects of each alternative on the biological, physical, social, and economic environment will be analyzed in 2011-2012.
3. Issue the Proposed KSP/RMP Amendment and EA. This step will begin with the release of the proposed RMP Amendment and EA for a 30 day public protest period.
4. Issue the Finding of No Significant Impact (FONSI) and Decision Record (DR). The FONSI and DR will be issued following the completion of the 30 public protest period or the resolution of any protest, if a protest is filed.

VI. Opportunities for Public Participation

A website for the Squirrel River Management Plan was developed to keep the public informed of the planning process: http://www.blm.gov/ak/st/en/prog/planning/ksp/squirrel_river_srma.html
This website contains all planning related documents, including this scoping report, for review.

Inquiries about the Squirrel River Management Plan may be made in any of the following ways:

Telephone: 907-271-3202
Fax: 907-474-2282
Email: AK_CYFO_GeneralDelivery@blm.gov
Mail: BLM Central Yukon Field Office
Attn: KSP/RMP Amendment
1150 University Avenue
Fairbanks, AK 99709-3844

Comments will be accepted throughout the planning process. Comments may be submitted through any of the mediums listed above. A series of newsletters will be produced throughout the planning process. The purpose of the newsletters is to inform the public of important benchmarks and to provide suggestions for ongoing public participation in the Squirrel River planning process.

VII. Scoping Comments

A. The impacts of transporters, transported hunters, and commercially-guided hunters on subsistence and general hunting.

Name	Source	Comment
Unknown	Anchorage Scoping Meeting	<p>I looked all through ANILCA. I can't find anyplace in ANILCA where it's subsistence users are protected. I know where subsistence use is protected but I don't find any coalition for the word users. In other words, I know what's going on in the western, you know, part of the region and the local Native people are complaining about too many people but there is no biological issue there with caribou and this slide is all about ideology. It's not about subsistence use. It's not about subsistence impact. This plan isn't about subsistence impact. There's no documented biological problems in the whole western arctic.</p> <p>But I guess what my point is, that the -- if, as planners, you start thinking that somehow users, subsistence users, are somehow entitled to some special sort of consideration and there's -- you can't connect the biological, you know, resource to this ideology, you're -- have a propensity to discriminate for no valid reason.</p>
Unknown	Anchorage Scoping Meeting	<p>Takes 25 years to make a tradition. There's not any more traditional customary in Alaska than air taxis having broad latitude to come and go wherever it was safe to operate and I think that any notion that we're going to start restricting and limiting that now is something that needs to come out of some serious statewide, region-wide planning, not from step-down plans like this.</p>
Unknown	Anchorage Scoping Meeting	<p>But how does that -- that decision (to limit transporters) comport with the -- you know, with the reality? The State of Alaska establishes seasons and bag limits and sells licenses and tags and it's an unlimited fashion. I mean, it doesn't seem to me that that step did anything but limit someone's opportunity.</p>
Unknown	Anchorage Scoping Meeting	<p>Well, actually, what I'm -- my point of view is this, first of all, this is pretty much all about ideology. It's not about habitat impact or resource impact and because it's about ideology, the targeting the people, you know, just especially as sort of -- like a guide or their taxi or the people who use the services of guides or taxis is discriminatory without just cause. All users, whether they're local people or non-local residents or non-residents of the state, regardless of whether they're guided or -- get a ride from an air taxi or use their own airplane, are all impacting the ideology, just that. It doesn't matter to the person who's not having a good time because there's somebody else there, whether that person came on an air taxi or flew their own airplane and -- or came in through a guide or lived in Kotzebue or Noatak or goes there or both, you know? So in order to be like fair about it when we come to these ideology issues where we have other people, the agencies should adopt a program that's fair for everybody regard -- and let that person decide -- it may not necessarily exactly when or where they want to go exactly but at least let them decide how they want to experience that opportunity, whether they want to do it at -- with a guide or whether they want to hire an air taxi or whether they want to go with their next door neighbor in his airplane or use their own boat, you know, and in order to do that -- and I think the benefit of that is 50 years from now -- there's a lot better management tool in the next 50 years because then you have a way to having a direct interaction with the actual person who's using the opportunity and, you know who's there, you know when they're there, you know why they're there, you know what they're doing, you know how they did it and what they did it with. I'm not -- you know, if we have to change things you know, we should change things so that they're not influenced by another government. Those are federal lands. Those are not federal lands that a tribe, a local tribe, has some special influence over, particularly not when there's no subsistence, no biological issue, no habitat issue. I mean, and the -- we're -- you know, this is the beginning of a new wave. You know, I've been here 35 years. Don't know how long you've been here but we get in these situations in Alaska where -- and I'm not pointing my finger at you -- but, I mean, where an agency, you know, does -- well, like what happened at the Noatak, you know, two years ago with George Helfrich. You know, he establishes a moratorium, he limits the number of seats that -- you know, on -- you know, air taxis can use. He did all that without any legal</p>

		<p>authority to do it, without any public meetings, without any hearings. We now have this plan, the Selawik plan. It's the arctic people, the ANWR people all thinking that we should limit air taxis and the people who use air taxis and it all stems from the tribal influence on a public process -- and it should be a very public process, a very public plan, and it should be fair and in the case where we don't have any biological issues which is what we got, you know, favorite time/location conflicts, I can -- I mean, you got them in Tahetna Pass, you got them on the Kenai River, you got them, you know, in Avigan (ph), you got them every place you want to go in Alaska between August and September 20th. There's little favorite time/location conflicts going on and it's not the government's job to solve that problem and it's especially not a planner's prerogative to, you know, start implementing these kinds of things just because somebody else has gotten away with it but now, I mean, I'm getting sort of long-winded but I guess what I'm saying is I think what's better is that establish a program where you have to have limits and you let the people tell you -- let those people get their limit, their opportunity, and then let them go and decide if they want to hire a guide or an air taxi or just go on an airplane or both and you have that direct relationship with that person who's using our public lands and if the person's in Kotzebue, he has to have a permit just like the person who's in Anchorage and I would think that that's a lot -- you know, it's a new idea but I think it ought to be something under serious consideration.</p>
Unknown	Anchorage Scoping Meeting	<p>Yeah, it's what impact in the resources or whatever it is and it's -- it should be -- shouldn't be the -- you know, commercial aspect of the guide or a transporter is -- I mean, they're actually - - you know, and with respect to hunting, I mean, they're not hunting, you know. They're not -- an air taxi is just a ride, that's it. I mean, it's not really assisting anybody to hunt as far as the air taxi goes. Yeah, we could care less, really, if the person in the back seat is floating the river or fishing the river or going for wildlife viewing or photography, going hunting or, you know, just camping, you know. It makes no difference to an air taxi operator.</p>
Unknown	Anchorage Scoping Meeting	<p>On the local Native people, I've got a little [insight]. I lived up there. I've traveled the country. I don't generally see local Native people applying for permits. You know, they're not overjoyed with regulation, in general. I understand that everyone's been invited in and with them comes regulation. They're not always the best to follow such regulation. I'm sure you get a lot of phone calls from the communities on different issues but when it's time to apply, how many local Native people are going to apply for permits to use these BLM lands or not -- Park Service lands, federal lands? You know, these guys, as commercial operators, they're pretty good about permitting and stuff and there is a lot of conflicts going back to the Noatak. Has it changed anything if you ask people now in Noatak? Probably not. You know, they -- they're glad that they don't have all these outside hunters on the riverbanks in the fall when they're hunting but has it made their subsistence hunting schedule any easier? Not lately and it had nothing to do with how many people that were brought up. They didn't like it because they didn't like the added competition. It could have just been cyclical because in the years where there was 500 camps on the Noatak dropped off by a number of different outfitters, many of which were local, there was a lot of caribou. As the caribou started to change their routes, for whatever reasons -- some of the biologists aren't here to explain it. I don't think anyone's going to tell you why the caribou do what they do but, at any rate, there's not a lot of caribou through the corridor anymore. Was noise an issue? Could have been. You know, did the local people -- are they any happier, do they get any more animals? I can tell you personally this year they were not happy. Noatak in particular just because of the regulations have been in force and probably got there - - I'm not sure but it happened and the effect was that there's a lot less camps on the Noatak. That's not necessarily the case in the Kobuk. There's still a lot of camps in the Kobuk. There's still a lot of conflicts between traditional use and sport hunting and this year there wasn't a lot of animals during the season when people preferred to be out there in the country. So everyone was kind of slowed down. Now, during those times, everyone blames everyone else but, you know, are the Native people in the communities going to follow whatever rules you set up and then when you come in and enforce the rules that you set up in a fair and equal manner, I can tell you by living there, they are not happy. I don't know what kind of comments you get but, from talking to the people, they're just not overjoyed with the regulation when it affects them.</p>

		When it comes to their traditional hunting and subsistence, when you step in and tell them you can do this, you can't do this, you better take it to the hoof, they're just not happy campers.
Unknown	Anchorage Scoping Meeting	Yeah, one of the sources of information that we have available to us is the harvest tickets, you know, that people turn in but it -- like I said, it's only as good as the people who are following the rules. These gentlemen, the people that [the transporters] bring in, hundred percent compliance. Maybe not a hundred but we're going to above 90 and probably closer to a hundred. In the Native community, I couldn't tell you what the compliance is but -- I'm not going to guess at a number. I'm going to tell you it's nowhere near that.
Unknown	Anchorage Scoping Meeting	As far as the use goes, I can just tell you they don't care who you are and whose land it is. To them it's their land and you are not going to tell them they can't access their land. If they happen to have a snow machine and they're hunting wolves -- or a boat or a four-wheeler, that boundary, when that wolf goes across the boundary, it's not clicking. You know, they're not all with GPS's and there's no sirens that go off and it just doesn't matter to them in the mindset. The mindset is somewhat different than the regulatory mindset and the planning mindset. To them it's actually still theirs and this isn't just the older generation, what you might be calling traditional use or whatever, this is going to continue to go down through the generations and I don't think it has anything to do with the tribal government. It's more of, you know, their -- just their general mindset that this land is theirs and the resource on the land is theirs and they can manage it perfectly well without a lot of outside people telling them how. That's my general take on what I see throughout the northwest region.
Unknown	Anchorage Scoping Meeting	<p>I didn't get a chance to hunt at all this year but I have been up there many times in the past, flown over, landed. Friends of mine fly and live in the area and I've traveled through pretty extensively even in winter on snow machine. My general feeling about the whole area that you're talking about is that it's a very wild area. It has very little human use. I don't know how much you found historically other than hunting camps and stuff. There's no traditional village sites that I'm aware of. You know, the impacts of hunting camps are, overall, I would have to say minuscule and I'm not a big promoter of them or anything but, you know, even the little bit of scarring around the camps with the outfitters, guides or whatever bringing in four-wheelers and three-wheelers, it doesn't come back real fast but, like you said, from the ground, you can't really see it and once you make a trail, it's easier to stay on the trail than to just continue to beat across the tundra other than on the high wind-blown ridges. That's generally rock anyway and doesn't show any usage.</p> <p>You know, I can't say that I saw lots of traditional signs of travel but some of it would go away but you do see -- on some of the routes through the country, you will find sleds in different states of disrepair. You will find older tin cans and fire pits showing some -- I guess if you're going back 25 years, then we're going to call it traditional use. You know, I don't dig in the ground or anything but up there, stuff -- if it isn't buried, it stays on the surface for quite some time. So, you know, you guys have been -- as an agency, have been through the whole area a lot and I don't know how much traditional use and stuff you can find. I'm not sure why this wasn't a wild or scenic. It doesn't hurt my feelings that it wasn't, of course, because to me all of these designations lock out future use whether it's from citizens or tribal members and I'd rather see the land available for -- you know, for future use and, you know, some of the mining industry has scoured it but the stuff that's gone on locally in the last 10 years has been very environmentally sensitive even up there. The older stuff that's up there is still old and left as it was but the stuff that they do nowadays, they tend to break it down unless they're working in cohorts with tribal members and leaving stuff up on what you're calling private land but, otherwise, it seems as though they break their camps down, they clean them up. I don't see a lot of signs of waste or water left behind from such exploration, I guess, is what I'm going to have to call it even though some of these mines have been around for well over 50 years.</p> <p>So I'm not sure where the whole plan's going to go but I hope that you allow private citizens to use it and continue to use it in the future as they see fit as long as they're being respectful to the land and to other individuals that are using it and, hopefully, there won't be a lot of conflicts like there was in Noatak. I don't know that Noatak worked as an experiment or a</p>

		<p>plan or a regulatory thing. I -- you know, the people in Noatak seem to be happy that it passed but if you talk to them this year when you're up there, they're going to let you know that there just wasn't any caribou. It had nothing to do with the lack of outside hunters or -- you know, so I think there could be some lessons to be learned there.</p>
Unknown	Anchorage Scoping Meeting	<p>Well, you need to -- I -- if there's ever a determination that there is a biological or ecological need to restrict the number of users, it only makes sense to -- you know, on federal land to make it fair and equal. Now, I understand that federally-qualified subsistence hunters have priority to a limited game source. Now, if that's the finding you make that there is a limited amount of caribou or a limited amount of moose, then, yeah, you can say maybe a federally-qualified hunter in that area should get priority for that harvest but until you find that, for any other reason -- for any other reason, you have to open it up to be fair and equal to every user, every American whose -- who has a tradition of living in this country and fighting wars in the past so that we could have places like the Squirrel River, you know? We've all -- that's our property as an American people and unless you find and make an official, you know, analysis of this, you don't even have an idea of how -- what's the amount needed for subsistence in the Squirrel River Basin, you don't have a clue. You don't know how many animals have been harvested in the last hundred years yearly by these villages. You don't know. You're just grabbing things out of the air and saying that all of a sudden there's this big issue when you don't have any data to support it, you know? So if the Park -- if the BLM is going to address overuse of an area, limit it to biological and ecological issues that you can define that you can go out there and do scientific research and clearly say yeah, we have impacts here for sure. If you step off into this favorite time/location crap, you're going down a quagmire of never-ending fights and battles and use that 810 tool. That 810 tool is a -- is not only a good public tool to bring in all the players but it stands up in court. 810 analysis stands up in court. Sooner or later, these things are going to get challenged. If you start kicking out guys who are making half a million dollars a year doing commercial guide trips up in there, they're going to have the money and resources to take you to court and when you go in front of a black robe, he's going to say how did you justify this and if you don't have 810 in your pocket, then you just say I -- it was an arbitrary decision by the park manager through discretionary authority, man, you're opening yourself up to all kinds of trouble legally, in my opinion. That's why 810 is there. It's there for you to use to make sure that you differentiate unsubstantiated claims with the facts, you know?</p> <p>And there's -- and as far as favorite time and location, we can't forget that the Native community has 11 percent of this state that they alone can hunt on. If they got a problem with sharing public land, they can go to their private land and hunt. Let's not forget that. They have in -- gigantic amounts of area to hunt and, yeah, maybe they need to work a little harder, spend a little more money to get to that pristine hunting ground. Me myself as an Anchorage hunter, I'm at a huge disadvantage. I live a subsistence lifestyle. My family eats wild game. That's a -- and I have to spend a ton of money to get from the middle of Anchorage to a pristine area for me to hunt where my quality of hunt meets my standards and I say that's all right. That's the price I pay because I value a high-quality hunt and I have my own personal level of quality. Well, let it be the same way with the Native community up there. Let them define where their threshold is for quality of hunt. Don't you get in the business of trying to define that. That's crazy. You'll -- you're just -- you -- you'll never go anywhere with that. Keep it based on facts. Keep it based on science. That's my recommendation and I'll formulate, you know, that into a more concise written comment and submit it as well.</p>
Unknown	Anchorage Scoping Meeting	<p>But the way they're limited there, there's two ways they're limited right there. There's -- about 60 percent of the opportunities are given to commercial operators and those guys do sell those seats to the highest bidder and then the other 40 percent that get to go every year put their name in a hat and get to draw and if they get the lucky draw, then they get to decide how they go down the river and at like Denali, you know, if you want to drive into Wonder Lake, you know, after September 15th, us sitting in this room have the same opportunity as some person sitting in an office in Florida right now to draw one of those opportunities to go drive the road. Again, you know, it's just too many people want to go there. They put some limits so they make it a fair opportunity for everybody. Now, if you want to go before September 15th, you can go down and get on the bus with 50 Japanese people and drive down</p>

		there and drive that way. He's a commercial operator but with respect to hunting, the -- I really don't want to see the -- any more than we already have situation where, you know, either guides or air taxis are authorized X number of opportunities that they get to sell those public to us but, I mean, I -- like I said earlier on the air taxi, if you -- you know, if I wanted to, I could benefit from a program like that, you know, but I -- I'm not -- I don't think that that has any value, public -- there's no public value in that kind of a program and I'm even wondering, actually, how you justify these six commercial guides when you are already considering you're going to have to limit -- you know, you're going to put limits on other people. I mean, it seems like the first people that would be off the table when limits become necessary would be the people that benefit, profit from it. The commercial interests should be the first thing off the table when limits are needed. You know, should be -- you know, that's the way it should be.
Unknown	Anchorage Scoping Meeting	I'm just saying that it's -- the point is it's inconsistent how the thinking is going on here, you know, that the -- you know, when you limit people but we're going to commercialize it, you know, and make it cost for them for people who can go and make it that much harder -- you know, but the rich doctors that got their own airplane, well, they can just come and go whenever and use their own -- you know, load the airplane up.
Unknown	Anchorage Scoping Meeting	And look out when the National Park Service told us to go down to Noatak. They went out and they said we're only going to limit air taxis to hunters. We're going to limit the number of seats for hunters. So now all of a sudden the air taxi guy's in the position where he has to figure out whether the guy is a hunter or a rafter if he's carrying that gun for bear protection or if he's carrying that gun to shoot something and eat it. You know, it's crazy and that's the kind of the quagmire you'll get into if you want to say okay, well, we're going to try to limit the seats to a specific user group. Then -- I mean, is truly this tax -- air taxi guy required by law of any kind to -- would he be in trouble if somebody duped him? I don't think so. I don't think a court would find him in fault. You know what I mean? So that -- again, that's another perfect example of the quagmire you'll go down if you try to go after an industry instead of the actual individual.
Unknown	Fairbanks Scoping Meeting	I think anyone who's familiar with a business overall, it can be difficult for rural residents to go through everything they need to go through to become a guide and it's not just -- you know, it's just harder if you're rural because the tests are in Fairbanks or they're in Anchorage or you have to work for someone that's already in the area and so I don't think there's any, you know, set obstacles to prevent someone local from being in the business but just by virtue of
Unknown	Fairbanks Scoping Meeting	Most of -- a lot of the villages that I have gone to, they don't particularly like the guiding operations, you know, bringing more hunters into, you know, their region so there's probably a pretty strong social pressure to not do that kind of business locally even if they wanted to but I don't think you'd want to.
Unknown	Fairbanks Scoping Meeting	All the hunters want the same time and, you know, the hunters back home are after the meat at the best time of year but it's also that time is a good -- the big bulls that have all that fat on them. Now, some of the guides back home are wondering if the general hunt clients are -- what are the possibilities of timing the hunt to where -- I guess it -- a lot hinges on desirability of the meat quality and I don't understand the industry and what the clients want enough but some of the ideas that guides back home have begun mentioning is to try to schedule the local hunt and the commercial hunts to be a little bit different so that there -- there'll still be some overlap but not quite as much intensity all at the same time and I don't know if -- how possible it is because of the rut's the rut and, you know...
Pam Miller	Fairbanks Scoping Meeting	I think the plan should look at the different kind of impacts that there would be on the subsistence users and the recreational hunting users from other sources, especially aircraft issues or boating issues that there might be and I guess part of that overlay of the different resource maps might be really helpful for people to see where there might be unanticipated conflicts that people hadn't thought of, you know, areas where there's high potential for a mineral or something that nobody's really thinking about now but they know it's in a place where they want to go hunting and they're already being bothered by the camp from a commercial guide or the traffic supporting these outlying like guidings. So I think the cumulative impacts are important to look at even if this isn't a environmental impact statement level review.

Unknown	Kiana Scoping Meeting	I know that -- we all know that the last three years been -- there's been very few caribou hunting plans and say the last five, six, six to four years, you know, a lot of people explore. There's a lot of hunters and recreational people too. Hunters were in plans and doing different things. Some of us think that's affecting the migration of the caribou, some don't but we're all told by our elders that if you'll hunt ahead of the herd, the first of the herd, it will always change the migration. They wouldn't let us (indiscernible). When we -- when the herd finally come to the Kobuk River years ago, they had us wait two or three days so we wouldn't
Unknown	Kiana Scoping Meeting	A few people like the transporters in there and the hunters and it went out of hand because there was no permitting. Can you set up something with this planning and permitting system?
Unknown	Noorvik Scoping Meeting	The Borough, they're not worried about nothing but guides and transporters or the number of hunters that are going in. Was there a limit set on that?
Unknown	Noorvik Scoping Meeting	I think at one time, we counted over 600 hunters up in the Squirrel River area. That seems to be a common number. 500 or 600, yes, sometimes even more, you know? I know these client -- these guides aren't going to make money taking two or five clients up, you know. They're going to take a lot more than that to get their money's worth, you know,
Bobby Wells	Noorvik Scoping Meeting	My name is Bobby Wells. I've been involved in the Squirrel River process when they wanted to make it wild and scenic working with Kiana and the locals. So we're back here again and we're discussing your plan and how you'd like to see it come out pretty soon. Traditionally, you know, we've had caribou come by here for years and I can say for years because I've witnessed it, I've seen it. We all know it, even run past by the village. We used to see that and now, you know, we're looking beyond the horizon and, you know, they're going a different route now and we're talking about that very land where they used to come by right there. We're wanting to regulate it so I hope, you know, because of the Tide Lake, you know, rural preference, that this plan would recognize those migration routes for caribou and enforce those routes because we can't control the airplanes, you know, and they're a factor too. You know, when they're flying up in the Squirrel area, they can turn the migration route. That's one thing. Speaking from this table right here, you know, listening to these kind of meetings for years, you know, I'm surprised that our own people don't have a plan like this, you know, the tribal government. You guys are making a plan. We should be doing the same thing. Parallel your plan to help monitor and see what's going to happen because if we don't have a plan and you have a plan, you're going to beat us out and this is -- we're traditional people. We hope and we wait but we don't have a plan. Maybe you'll include us in your plan but I think maybe traditional governments should have a plan and monitor exactly what goes on right there in the Squirrel to help protect migration routes and control the number of moose and bear hunting and all of that. See, these kind of plans support other people from outside. They do. But we don't have a plan to support our wanting to see the caribou come by here so that's my comment, you know, and, you know, I hope that whatever we say here might help you in your plan to enforce such as the caribou migration and, you know, number of animals taken here and there and how to control the guides, the number of people there. So we need -- if we're going to be involved with you, like you mentioned, right there, Noorvik and Kiana and Kotzebue, please, you know, take that seriously because we're going to wait for the caribou some more. We are. Thank you.
Hendy Ballot	Noorvik Scoping Meeting	My name is Hendy Ballot. I'm the residence of Noorvik. Looking at the proposed recreational area on the map here, I said earlier it's right in middle of the migration route of the caribou. Many of our residents here, we don't have the luxury of chartering an airplane and going up there and do hunting. We wait by the river in fall hunting. Fall hunting is very important. I would comment that in your plan, to really make a consideration of our people's subsistence use in this area, caribou is very important for our people. Again, we're -- are willing to work with you but you need to hear our side and let's work together on this. Caribou is a wild animal. When it sees somebody -- something moving and something different other than nature, they'll make -- they'll go through another route and the more camps and activities in this area is causing the caribou to take another route. Again, I'd like to comment that -- number one, that you make an effort to consider the subsistence use of our

		area and our people in your plan. Thank you.
Unknown	Noorvik Scoping Meeting	I remember something because I was just -- I'm listening to you, right? I read something and it said when they came, they had the Bible and we had the land and they told us to close eyes and pray and when we opened our eyes again, they had the land and we had the Bible. You know, when I hear BLM, you know, and how BLM and -- BLM, 1930's and long time ago, you know, how they got all the land from the Indians down there, you know, and then what -- and what's happening up here and what's happening inside our lands, you know, they told us not to commercialize, you know, in the lands up here, you know, and still all BLM coming up here to commercialize on this land. How about who's going to take the winnings and who's going to patrol, you know?
Unknown	Noorvik Scoping Meeting	All the hunters you see up there during the summer of all are white because it's too shallow for motorized boats the last 15 miles. It's shallow. It's too shallow for motorized boats the last 15 miles. No, you can get past Omar but the last few miles up the Squirrel, you can't go by boat. It's too shallow. You can't get all the way up that far in a jet boat.
Catherine Jack	Noorvik Scoping Meeting	My name is Catherine Jack. As a child, I -- you know, my family travel up to -- for the summer and we spend how many summers right there going up the Squirrel River and then back to Kiana, from Kiana to Noorvik. That's how I lived when I was a child. I've seen the place up there in -- at -- when I -- you know, you got to think of is this way, you know, we are Inupiat and the land you see out there beyond us right there above Kiana everywhere, it's part of us. There's good memories of those places right there where you go camping so whoever is for this plan made a big mistake because I am against it. You know, I am really against it. Everything right here, seeing the future right here. You won't be here and I won't be here. We're thinking about the younger generation. You've got to think of the, you know, young people growing up right here.
Walter Sampson	Noorvik Scoping Meeting	This evening, I'm going to speak as a resident of Noorvik. I was born and raised here and I lived off the land right here and my name's Walter Sampson. I think what you've heard tonight (indiscernible) with respect to some good ideas of what thoughts they're thinking of folks here and, traditionally, there's no boundaries (indiscernible). People have lived with the season. By that I mean these old folks move from camp to camp following the resources whether it was a fish camp, summertime, they could move to another camp in the fall. They moved over in other areas for trapping and hunting and that was a tradition. That was how they lived but, over time, things changed, time changed but, over time, what's been brought to us also made us different. The system that we have to live with today 20 years ago wasn't really there. We could plan for, we can design for to live how someone tell us to live. The State of Alaska is good at it. When -- in 1959, when the State of Alaska became a state, there was only out of 25 people, one Native that was involved in the write-up of the Constitution. That Constitution was written by 24 other people that migrated from the Lower 48. They didn't consider about how [we live] in Noorvik. They didn't come to ask her what's your thoughts on the write-up of the Constitution of the State of Alaska. They didn't come to the community to get input. It was written somewhere else for us and they call it Alaska's Constitution but it was written somewhere by someone for all of us. We've been planning for it too long. Plans that were brought in by federal government or state government, all of those plans that are brought to us in one way, shape or form has an impact on the way of life of these people. You asked these -- any of those folks that's been (indiscernible) this cost of living stuff and your way of life, they're going to tell you yes. You go up to the -- Dave's (ph) store, you go down to the Morris store, go take a look and see what kind of prices you will see. Fuel costs, gas, it's pricey to live in a community up north but yet through the filing process that the state and federal take us through, they'll consider those things. All they look at is what can we do with what they plan for you is what they say, not with you but for you. That's why it's critically important tonight when you design this plan, the input that folks are putting into it. The thought process is critically important, that it's incorporated into the design of the plan and not only spoken but also through the process of drafting. Once the draft is put -- been put together, we'd like you to come back to bring to us that draft so we can take a look at it and see what it has in it. If there's something in there that we still don't like, we'll ask you to take it out. If we see something in the plan that we want in the plan, we'll ask you to put that in the

	<p>plan and it don't (indiscernible) to us that you'll do that because that plan will have an impact on the way of life in this (indiscernible).</p> <p>In today's world, we live in a society, the areas where there's many landowners. We have the Park Service, we have Fish and Wildlife, we have the State of Alaska, we have BLM, we have Reserves, different land classifications and yet those very lands that we lived off the land today impacts us, our way of life because it changes our way of life. We have to live by the rules, by the laws that were set up. To restrict us in any way by taking the resources, these things have to be considered. State of Alaska today does not even recognize the tribal entities and the local unions (ph) and that's the message out there that the State of Alaska gives, unless you become a state-incorporated community, we will not recognize the tribe but yet we became part of the state system when the Constitution was written in 1959 but yet today, 40 years later, this is how the State of Alaska treat us. In many ways, we get treated like a Third World country and many of the rural communities were asked by the State of Alaska to become a first, second or third-class city governments with a caveat to say we won't provide you the dollars to run your city governments. Over time, they did. Today we've got many city governments. Many of the administrators that are working part-time, some that are -- volunteer their time to keep the services going and that's the kind of controls that the State of Alaska give us and don't provide the resources but yet we, as people, we say well, we're still people, we're going to live. When the State of Alaska comes to tell us we got laws to -- for Fish and Game, they might have laws and some of these people will tell you if you want to really talk about law, this is the law. That means if my family and myself were hungry, were going up, we might have something written but when this -- some of (indiscernible) are hungry, they're going up. In a sense, what that does, we become law breakers because somebody else broke those laws for us and it's really sad to see that it occurs that way. In many ways, these communities are suppressed by those state and federal laws. Their livelihood is impacted by those things. The State of Alaska is good at doing that. I say that because I sat on the state game board for six years and that board is a dirty board. All it does is play its game on how federal or state regulations will be written. I had to join that dirty game to get what I want from the state for my people, for voicing out some of the concerns that I raised for my people. Twice I got threatened in Fairbanks but I didn't care. It was the troopers that notified me that your life is threatened. I said that's funny. What I do for my people at the end that I can get for my people, that's good for me. I feel good inside but if somebody else wanted to take my life, that's fine too.</p> <p>There's a issue in regards to the way the state is set up. The State of Alaska, again, has its own way of managing resources and those resources are managed on the equal protection clause of the Constitution which means that everybody is equal. These folks are just as equal as somebody from New York and Anchorage or Fairbanks and that's exactly how the State of Alaska see these people. They ignore the way of life of these people in many ways. We have a different lifestyle than someone else somewhere because we live off the land. It's easy for someone in Fairbanks or Anchorage to go to Safeway, get their wallet out and get the meat that you want but for these people, they have to go out and look for it and today that lifestyle hasn't changed. They continue to live off the land. About 90 percent of the people in this community live off the land here. That's why the Native communities throughout the State of Alaska decided to move to federal management and the State of Alaska doesn't recognize them. That's true.</p> <p>The state -- the federal system today that's been set up also is impacted by the state's system. By that I mean there's a memorandum of agreement that was written between the State of Alaska and the federal board. That agreement, a lot of it, had what the state asks, what the state wants and the impact on the people it has. For example, the subparagraph of Title 3 of the MOU says that it was supposed to provide a priority to include other uses. That's the state's interpretation but the federal law under ANILCA provides for the subsistence take of a rural residence for the traditional folks that live off the land. That's the protection that ANILCA has for these folks but it continues to be challenged by the State of Alaska. You've heard last year the Governor. Soon the federal government for that provision that the federal system has for rural preference and that's their only protection that they have and that's the protection and that's the law that you need to look at. You've got it on your screen, Title 8 of</p>
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Unknown	Noorvik Scoping Meeting	<p>Whenever a plan is made by outsiders for us, we end up with many stuff like we can't do this and we can only do this and that. I think we need to start to stress with us. I just want to comment further on that. It's always been for us by somebody who doesn't know how we live, how our way of life is out here and I'm just (indiscernible) and make it known that it's like that. We're willing to work with you to make the plan equal for lands, for (indiscernible) and for our future children. We are -- tonight, they're part of us.</p>
Roy Barr	Noorvik Scoping Meeting	<p>Yeah, I -- my name's Roy Barr and I'm from Noorvik. I've been a resident of Noorvik for a long time too and my big concerns, you know, concerning the special recreation management area is, you know, the issue are, you know, some guidelines that are going to be set, you know, for like guides and people, you know, that want to do some recreation stuff up there and, you know, these here are mostly are like sports fishing, sports hunting, and a lot of times, you know, on -- in some areas, you know, like in the Anchorage areas, you know, there's been a lot of conflict, you know, with some sports fishermen and some subsistence fishermen and I see, you know, we're adopting this new type of plan here, you know, that's kind of alien to us. You know, it's like we're adopting another race into our territory here and these here have never been tested before in a wilderness are or out in the remote area but we know that, you know, some of these here have been tested, you know, like in the Anchorage area and stuff like that and there's a lot of conflict that comes up, you know, between sports fishermen and sports hunters and subsistence hunters. You know, we like -- you know, we'd like -- you know, I'd like to go for this plan but if it's -- you know, we'd like to have it prioritized on where -- you know, on sportsmen and stuff like that should -- where subsistence should have priority over sportsmen issues and stuff like that on where you import people into an area for the purpose of recreation and that's what my only concerns were on this plan.</p>
Unknown	Noorvik	<p>To your -- we're the kind of a people we are. You know, there are no restrictions, no</p>

	Scoping Meeting	<p>boundaries, in our hearts. We are who we are. We know the way of life. We learned it living off the land, our fathers, grandfathers. There's no boundary. You can't put no boundary in my heart. I'm free. I know I am. That's why, you know, for situations like this, I don't want to use the word fight. You got to fight for the right thing, you know, but, listening to John, you know, and Walter, we have to work together with the people, Noorvik, Kiana, Kotzebue, on these -- on the properties. So I'm at ease. You know, I'm at peace and I know regardless of how you draw the lines over there or what boundaries you put on other people, you know, as far as recreation, we wanted to incorporate our rights too under Title 8 for what we do. That's the only vehicle I know to work with you guys through the tribal governments if we have to because if anything is going to go away last in this world, it's the tribal governments and their rights. State can go. Other governments can go. Corporations, they can go but, eventually, the ones who's going to stand up is the people. You know, the have rights so the federal government recognizes that but I'm hearing real good things. Work together with you -- you know, you work with us for these things to improve the land. Thank you very much, you know, for coming and doing what you got to do, you know, but remember that we're with you guys and we hope that you're with us.</p>
Tom Okleasik, NWAB	Kotzebue Scoping Meeting	<p>My name is Ukallaysaaq and Tom Okleasik (ph). I'm the planning director for the Northwest Arctic Borough. First of all, I'd like to thank the BLM for coming to the region and this is the third meeting you've -- this -- the first meeting was in Kiana, then Noorvik and now tonight, you're in Kotzebue. So thank you for coming to the region and posting your meetings at a more appropriate time in the year so that people can participate and for putting this on the radio.</p> <p>The Borough has commented many times throughout the -- this planning process and we're glad to see the Squirrel River recreation plan being developed. That was one of the things that we supported in the overall Kobuk Seward Peninsula plan and it's important, I think, to continue to recognize subsistence use over the whole area. Subsistence can't be put in little corners or pockets and say it only happens here, it only happens here. It needs to be recognized that subsistence is a large area that changes over time and that the traditional use by the people of this region has included the whole region as well as even outside the region. So I think that's an important point.</p> <p>Also the Borough would want to encourage that subsistence continue needs to be the priority of this plan. That needs to be the number one use. If other uses are to be listed and competing uses are identified, that subsistence use of providing food, especially when that subsistence has been a practice for thousands and thousands of years.</p> <p>In looking at how the community can be involved, that was one of the questions that was being posed, I'd like to encourage that there's continuing workshops and trainings in Kiana, Noorvik and Kotzebue and those workshops could include the plan but they could also include what, I guess, is special recreation. How can the community develop tourism? How can the community look at commercial hunting services and then how can the BLM fund those types of workshops on a regular basis to work with those community members? So I'd like to see that in the plan since we're talking about a special recreation plan.</p> <p>I think another important part of community involvement is to have permit review committees and I know right now the permits are prepared by the BLM staff and we kind of see them as public notices and just comment. It would be nice to see for this area that a committee is developed that has community involvement so a representative from the Borough, NANA, Maniilaq, Kiana and Noorvik, I think, would be real appropriate to work with the staff and then they would review the applications as well as approve, vote on approving those applications. So I think that'd be a good way of having community involvement in the permit decisions that are being made by BLM so it's not so isolated in Fairbanks.</p> <p>Another important part of the plan is to have a monitoring and enforcement of these lands and we do need to recognize that it's a very seasonal monitoring period, generally, from August to October every year. So it's not 12 months a year, it's three months a year and during that time, it's important to have fly-overs, a wildlife officer or a lands officer come and see who's using the land during that period because it is a seasonal pressure on this area. It's in the fall and it needs to be recognized as a trophy hunting period and that's, I think, an important -- as you look at the users and you're talking about general hunters, well, they're not general</p>

		<p>hunters, they're very specific groups and, of course, they want to, you know, call themselves general but we have subsistence users. That's a group of hunters. There's the sport hunter and there's also the trophy hunter and I think most of the conflict we're having is with trophy hunters that want the large antlers in the fall. They don't come back in the spring, you know, when they migrate through. It's during the trophy period of the fall and, of course, the conflict that people are only taking this trophy or the antlers without sufficiently harvesting the meat, you know, that's an important piece of the categorization of the people we're looking at is trophy hunters and you could see that when it comes to somebody hunting for food, the priority of food is more important than the trophy, you know, and I think coming back to that comment that recognizing subsistence is an important use over other uses, it's going to be a guiding element, you know, to this plan from the start.</p> <p>We do support the capping of the number of transporters in the area. I think the real problem is transporters work as guides. Also looking at capping the number of clients they could transport to that area as well as the group size that they can transport. When the Borough submitted our comments back in this a few years ago, we supported the smaller group size but then the BLM approved a larger group size. So we still look at smaller group sizes as being more manageable and less conflict and the Borough would continue to support the smaller group size versus the large size.</p> <p>And, lastly, I'd like to comment that we need to make sure that the BLM permits that are granted for this area, they need to ensure that they're getting their borough permits and that was one of the major coordination issues that we've talked about in the past is we've done a little better with BLM. You've sent us some copies. We've had some opportunity to comment on who we'd like to see approved and who we'd not like to see approved based on who's getting their Title 9 permit and who is not. And so we've improved some communication but we're still not necessarily matching compliance and making sure that as we're issuing permits, that they're getting all their necessary permits to operate and when they're not getting their necessary permits, how does that permit get revoked or challenged or appealed and so that needs to be worked out, I think, in this plan as well but I'm sure there's other comments in the room but, hopefully, that gets people thinking there's some other public comments.</p>
Pete Schaeffer	Kotzebue Scoping Meeting	<p>My name is Pete Schaeffer and -- well, my middle name is Karluk but I kind of thought I represented myself but I kept thinking about the 64 years I've been around and seen the changes in patterns of hunting over the last 40 years at least and I'm also a member of the caribou user (indiscernible) group as, you know, well as some of the other folks here and I think we've pretty much studied to death all of the issues pertaining to it because I think there was three major areas. The residents that live here -- and I'd like to point out that I kind of wanted to go at this recreational thing on Kobuk or Squirrel River special recreation management plan because I think recreation connotes following within the foot of the (indiscernible) that it seems that areas -- seems like Yosemite and Yellowstone where you can live on -- or you can visit 12 months of the year, I guess. The only interest in this area is, basically, the big game hunting. I wish they'd classify caribou again and take care of the problem but, basically, it evolves around the caribou, very little about the moose because I think, you know, they appreciate moose being around, I think. They're not a priority and I think within that working group, we've had over the last three years, I think, many meetings related to trying to solve the issues pertaining to various and kind of mixed up with the latest phenomenon of global warming and all that behavioral change with the animals and we're concerned about the -- that as well because we are not experienced in global warming and we're trying to grasp the -- what the ramifications are in terms of what the Native hunter has to do to survive up here and I think exacerbating the problem is the people that hunt for money or, basically, the commercial operators and I'd like to point out that in my personal opinion, there are two types of transporters. There's one group that cares about the people up here and adjusts their ways accordingly and there's the other group that just don't give a damn about anything but themselves and -- but the (indiscernible) they're carving out of this whole area and activity.</p> <p>I think that in terms of trying to come into some solution to the user conflicts is always running to jurisdictional issues. Obviously, the state has some management scheme. The</p>

	<p>different federal agencies have their own management scheme and I think therein lies another problem and that is that I think the federal agencies are geared for service to American in general which I'd like to point out that it brings out the little differentiation in terms of what I think, you know, Tom was saying, that we're squeezed into a certain calendar parameter of where -- between August 15 and September is where all the activity generally happens. It also coincides with the Native hunt because we have developed a pattern over the eons to take the best animal for future use including some of our traditional celebrations which I see absent from moose descriptions which I think kind of treads on Richard Nelson's area where he basically talks about Native (indiscernible) activities and making (indiscernible) and those kind of descriptions which I think it's not like it's an accident that it only happens in Koyuk hunting area, it also happens here and probably every other Native settlement within the state. One of the things that -- in the calendar years that when you recreate, I think that's where we begin to have little problems, that you come up here for a couple weeks or 10 days or whatever but the fact of the matter is that what about the other, you know, 51 weeks out of the year where the subsistence hunt's depending on where the animals go. It always depends on where the animals go and where the resources are because then in the middle of winter or in the spring, the hunting patterns change to accommodate the seeking of different types of animals around and some of that knowledge is based on observations that, in my personal opinion, are extremely skilled but yet dismissed most of the time when we go over (indiscernible) and talk about seasons and bag limits and all that kind of stuff.</p> <p>I think that in that regard, the calendar year becomes kind of an issue with us because in terms of where all of this activity and conflict happens forces us to make that up for the animals we don't get within the hunting season, so to speak, when all of that activity happens at pretty much all the same time. So I think that there's hardly any consideration for the year-around residents, let alone the fact that the animals that are here still is because we have certain ways of dealing with the populations in terms of when we see our needs and taking a look at the animals and see whether they meet our needs and then take as few of them as we can to satisfy what we need to do with putting our food on the table, so to speak, and I know that this Squirrel River area where I started going there probably back in the seventies and also on the other (indiscernible) of nature that -- is that like this year, the caribou went and high-tailed it all the way around in a circuit pattern to begin to pretty much emerge in the upper Kobuk. In other words, they kind of avoided the mainstream area which goes right through the Noatak preserve and, fortunately, when that happens in -- us Native hunters got to adjust our patterns to where if we don't meet our needs in late September which is our preferable time of year until they start to rut in mid-October, then we have to go and figure out what we're going to be doing for the other 11 months of the year. So, you know, I think that the calendar issue is also complicated by the fact that we have this global warming phenomenon which is significantly altering the behavior and the movement of the caribou. So I think that in terms of how this all -- all this process is going to happen, I think that what needs to also be considered is the continual use beyond the conflict and times and the calendar to what happens in the rest of the year because we -- we're not limiting ourselves to August 15 to the end of September and what we need to do to make a living up here and then also fueled by the other societal issues that plaque us including the -- not so fundamental but the price of fuel which is extremely high and especially in the villages and that that, in fact, has changed some of the hunting patterns for the Native hunter as well.</p> <p>Getting back to the issue of what to do in terms of how you accommodate a way of life into a management plan, I think it's extremely difficult because then the tendency is to put in place a scenario that might fit one year but might not necessarily fit another year which is another difficulty that the user conflict group has recognized in terms of trying to figure out when to start and, of course, several of the northern groups, I think, were stuck in there on purpose and I think that the Board of Game is there to make sure that nothing detrimental is happening to make recommendations that would be considered the hardship for their constituencies and probably some federal agencies as well. I guess what I'm saying is that there is going to be the development of a management plan that needs to encompass more than what I think I see in there and we also forward in the working group some scenarios to kick around at least for discussion and one of them's to have a split season for people that hunted for food and to have</p>
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	<p>maybe earlier access versus the people that hunt for funds and they could go later or somewhere to accommodate some of the Native food gathering that is necessary to happen in this region. I guess I don't have to tell you that you at Kiana or Buffin (ph) or somewhere and you'll see the price of a chicken or a gallon of milk and it'll probably make you appreciate where you come from all the more. It's extremely high and the reason it's extremely high is that the price of fuel when it goes up affects the cost of freight and all of that kind of stuff. So the other unfortunate fact is, like global warming and like the development of some management plans, we've tried very hard to effect some of the planning in terms of trying to accommodate some of our concerns. I can recall the first presentation by the National Park Service somewhere around the early eighties that was basically a dictation as to what we were going to do and what we were not going to do. Well, it took about three years to finally get rid of that superintendent but -- and I think that, over the years, that as we've shared the knowledge -- because I think a lot of us made the conclusion that our citizens are going to be here next to forever so we might as well try to develop a working relationship with them just like the other federal agencies. But, as time goes on, I think our concern is that we see more of a disappearance of what we think is critical elements and our description of our way of life as trying to translate it into some of the management schemes in general because it's almost sometimes like putting a round peg into a square hole in terms of some of the psyche that people miss and I know we don't know the federal psyche very much but, on the other hand, we can tell the federals that they don't know a damn thing about us either which is really too bad because the fact of life is that we live here, you know, year-around and we have to make our adjustments and the more that we have to run into conflicts either in regulation now or in pending regulation, whether it's state or fed, it just creates another hardship for us. Finally, I'd just like to tell you that, historically, it was the feds that drove subsistence hunting -- I hate that word but the traditional way of hunting underground on two occasions. Back in the early fifties when they decreed that you can take no more than five caribou per family, what happened was that the hunters coming back (indiscernible) and all that, we waited at the mouth of Noatak until it was kind of dark and then a good deal was (indiscernible) this way right to the back yard. So, you know, that's -- that was what happened as they built the poor regulatory processes. The second time it happened was back in the seventies when the Alaska Department of Fish and Game decreed that the caribou had crashed to somewhere around 75,000, later to find out that there was a one-inch thick of documents that debated whether it should be 75,000 or 113,000 or somewhere in the middle and I think that when we were hunting up there, the good thing was that they kind of left us alone because there weren't many enforcement people then but what they drove us to do is then in the middle of the night during the full moon was some of those village guys knew the way in the river well enough to navigate to get out of the areas where some of those park service employees were. So I don't think we want to see a situation like that again and I would, you know, be extremely cautious of what regulation in a management plan would be, you know, 10 years down the road as the conflicts get worse and then perhaps we're subject more to some of that corrective action than the ones that come up here just for a sport and to hunt for the hell of it. So, anyway, I'm sure that there's a -- I probably should have read more because I hate not doing my homework. It's just kind of like trying to give you some feel as to what some of the people are thinking up here in terms of how things are -- how things were in the old days which was fairly self-regulating. It was by no means, you know, to treat everything to the development of whatever we had to do after ANILCA because -- a term that, you know, instituted National Park Service and the parks up in the northwest areas, BLM and U. S. Fish and Wildlife Service up in the Selawik area and then all of the statuses of different bird sanctuaries and public (indiscernible). I can only say that back in the fifties and sixties, we had to kind of sneak around and have some way to live a traditional life is to try to avoid being caught. So, hopefully, when this management plan is put together, that there is some partnership with the enforcement agency because I know that there is complaining in some areas of the state that when enforcement people even have authority to go check up and they're freezing. I mean, I think that's going a little too far but, you know, another incident where that happened was when two fellows went and arrested Elmer Ward for having illegal stuff in his freezer and I think went to a park to guard some fish in Georgia somewhere and the other went</p>
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Unknown	Kotzebue Scoping Meeting	<p>I come up here -- you were talking about transporters and outfitters at the Squirrel River. I know there's lot -- lots of activity that happens around Squirrel River with transporters out there so how about the others, small people that come in like from Nome, Bethel area and Bettles? Because I've seen them coming and when they land there on Agi where I have -- I ask them where they come from and they come from a certain area I just mentioned. Also, they stop over at Squirrel River getting their caribou and stuff like that. What I'm trying to say is the extra activity that's happening is affecting the people, especially around Noatak when they're going -- diverting the caribou and they divert them with -- because they go over to Agi and they're bothering us and also the transporters and outfitters last summer was a problem because there was no caribou going on. There was extra activity because the guys that are dropped off are calling their transporters to pick them up and take them somewhere else. I think to and from is a big effect on us because it -- the noise that's happening above is bothering us down here below and I think you have to do it, then the timing was mentioned that the timing involved, maybe we could have timing when we should let the transporters or the outside hunters be dropped off. I will not agree to a time due to global warming. That warming could be good for a year and no good forever because that will...</p>
Attamuk Shiedt	Kotzebue Scoping Meeting	<p>Evening. I come up here -- you were talking about transporters and outfitters at the Squirrel River. I know there's lot -- lots of activity that happens around Squirrel River with transporters out there so how about the others, small people that come in like from Nome, Bethel area and Bettles? Because I've seen them coming and when they land there on Agi where I have -- I ask them where they come from and they come from a certain area I just mentioned. Also, they stop over at Squirrel River getting their caribou and stuff like that. What I'm trying to say is the extra activity that's happening is affecting the people, especially around Noatak when they're going -- diverting the caribou and they divert them with -- because they go over to Agi and they're bothering us and also the transporters and outfitters last summer was a problem because there was no caribou going on. There was extra activity because the guys that are dropped off are calling their transporters to pick them up and take them somewhere else. I think to and from is a big effect on us because it -- the noise that's happening above is bothering us down here below and I think you have to do it, then the timing was mentioned that the timing involved, maybe we could have timing when we should let the transporters or the outside hunters be dropped off. I will not agree to a time due to global warming. That warming could be good for a year and no good forever because that will...</p> <p>And I wanted a user conflict on the timing and we need to worry about the timing because, under the state, they could stop fishing any time they want if they do not go up the river. What we need to do is stop the transporters and outfitters being brought to at Squirrel River with timing, then they cross at a certain area, not by date and time. I will use the fish for a reference. In fishing, if there's no fish going up the river, they will not open commercial fishing. What I'm saying, if they know about crossing the river, they do not allow transporters and outfitters dropping off hunters until we maybe just get our harbor share. To me it's very important, the timing and it could be done under emergency orders because we are suffering because if some activity happens at the Squirrel River, the people from Noatak will suffer, the people from Kotzebue will suffer and I'm the one -- one of them that hunt there and I tell you one thing, there's transporters that building airports at Agi and they would just hop over to Squirrel River. The only difference between Agi and Squirrel River, they're the -- some -- same mountains but they -- we're in different areas. There's one to Kobuk and one to Noatak. So whatever activity happens, conflicts with Noatak and Kozebue and on to Kivilina and so</p>

		<p>there's a big impact. So not only the study has to be done around the drainage of Squirrel River, I think you have to look also the other impacts it's having in the other villages. It's important but, like I state again -- and I'll say it again -- timing is very important under emergency orders. Maybe we can stop them people, transporters, having too many spite camps at Squirrel River but the other activity we had last summer is there is no caribou in Squirrel River and they had extra planes picking up their people they dropped off and taking them somewhere else. Thank you.</p>
Enoch Mitchell	Kotzebue Scoping Meeting	<p>Hi, my name's Enoch Mitchell. I'm from Noatak. (Indiscernible) and I'm from (indiscernible) too. When we were first trying to get those few dates in the case and (indiscernible) and I don't need to push (indiscernible). I'm going to speak about that. You know, they're -- that Squirrel River is (indiscernible) close to Noatak and I was like oh, (indiscernible) you can just walk there and (indiscernible) from Agi River. They're not too far apart and they're kind of like in the same valley and that and from what I -- in the past -- you know, when we were first trying to put it (indiscernible) dates for the controlled use area, I see where the date is August 15th and September 3rd and (indiscernible) and it starts going (indiscernible) to the mouth of the Noatak. Before we try to -- even tried to put (indiscernible) in there, this made a lot of conflict and that's why the seasonal dates have gone by and then when I first went up to the Fish and Game, I was turned down. I tried again and they gave me two weeks and that first year, two weeks was in effect, they were useless because they came after the (indiscernible) dates was in effect so I (indiscernible) Board of Game again to see if we can slide it (indiscernible) when the caribou come. Fish and Game (indiscernible) couldn't put into words and -- for the Board of Game so we ended up extending those dates to August 15th, sometime this early, and it's on the 5th today and it really helps that today. Now, it depends on the weather. The (indiscernible). We can hardly stay in the table and (indiscernible). This year (indiscernible) there's a lot of people in the village of Noatak needing catch to catch and a lot of them -- there ain't a lot of them with caribou either because it (indiscernible) and when we finally found out, we were wondering what's going on. We thought, you know, something happened to them. They're kind of diseased or something and I was (indiscernible) but then we found out later that they were not going over the east because of slow river. They hit the Agi, they hit Noatak (indiscernible) got some over to where we could go hunt them and -- but now they've been turning and maybe halfway to Skone (ph) River. We thought maybe there was (indiscernible) and they (indiscernible) about 150, 200 miles up the Noatak River and (indiscernible) us way high in the winter and the price of gas is way high an you shoot animals in a trailer and -- but the (indiscernible) and my family's (indiscernible) and people are hurting for (indiscernible) right now. Today we're asking where's the caribou. (Indiscernible). We have questions too, you know, and before (indiscernible), I was involved with this (indiscernible) -- I mean, for our people and we always come by and -- the people, the hunters, the transporters and the guides and the agencies and the people that's working, (indiscernible), anybody, to my knowledge, I mean, they (indiscernible) right there instead of, you know, (indiscernible). You know, I think it's really (indiscernible) continue to help each other and support each other. (Indiscernible). The more people call in, the more voice we have and the more voice we have, the more power. Thank you.</p>
Enoch Mitchell	Kotzebue Scoping Meeting	<p>You know, (indiscernible) you know, but it doesn't -- it's by the river and I think you should have one for the Matanuska River itself. (Indiscernible) to me by someone (indiscernible) from here and Noatak. I can see the trail. They're there all the (indiscernible). They plow these trails every year. That's why there's trails next (indiscernible). Yeah, anyplace they want to go they got trails. One of these caribous are leaders. Most of them are followers, you know, and they know when to move. (Indiscernible) don't know when to move. They know these trails and (indiscernible) on the river and I don't see why we can't do that with a resolution but the (indiscernible), you know?</p> <p>And I was saying about, you know, like (indiscernible) involving the Native hunters, they hunt by boat and we don't have an advantage of seeing caribou outside the trees, over the hill 10 miles away as the hunters in the plane. They can drop them off anyplace they want to (indiscernible). Yeah, we got to stay right on the ground (indiscernible). I guess (indiscernible). Those planes could approach and land just about anywhere and the caribous</p>

		<p>there and one thing you should have control (indiscernible) is then there be some meat too. (Indiscernible) and I guess it's getting harder and harder. (Indiscernible) at least -- you know, I think everybody could be satisfied and everybody could get what they need without conflicts in -- we never -- we -- us Natives never got to understand what the (indiscernible). We can't by our boats by the river and those animals come (indiscernible). They cross here and they keep going. They know where they're going but they're just there for like a week, you know, passing through during the time to catch them. Well, that migration (indiscernible) come that way and then come up (indiscernible), right? This hurts a lot of people because they're -- these hunters (indiscernible) the way we hunt, maybe we got to work together and just be satisfied if (indiscernible) but that's okay. Thank you.</p>
Mike Carver	Kotzebue Scoping Meeting	<p>Hi, my name's Mike Craver (ph). I'm on the fish and game advisory council for Kotzebue and, you know, I'm trying to control all these transporters and I think it's the transporters that's the problem, not the guides. You know, the BLM land up there, that's where it's got hit the hardest. I know a lot of our animals are beginning to move farther and farther east and they didn't make it, that's a blessing because of the fact that maybe these transporters will move to Anaktuvuk Pass and leave us alone. You know, we work hard in the Fish and Game Advisory Council to preserve, you know, our way of life, our tradition, you know, and our animals. I know our anim -- our caribou herd is like still 400,000, roughly about there. It's pretty hard to put a limit on something that has that much but when they're not passing through here, you know, I don't think -- I think we really need to begin to have a coalition of Park Service, Fish and Game, BLM, you know, Fish and Wildlife all gather together once a year and have a big meeting to see if there's a way to control these transporters, make a limitation, either raise the, you know, per hunter rate of -- I believe it was a hundred dollars. I'm not too sure but it needs to be raised to where, you know, they have a little more difficulty in making money, they're kicking more money into the region than they are into their pockets. That way the money is staying within the region. You know, this fall, I went up to Noatak and I stayed up there with my significant other at the hatchery and I've never seen that tundra like - - there was nothing for weeks, nothing, no caribou. So me and my son, we took our four-wheeler. We went up to Agi and then we took off hiking to go see if we can get a sheep and we were hiking along and there's five Cabela's tents sitting there on the side of the Agi River. We didn't run into anybody then but when -- as -- after we went up and I had seen somebody up on the hill but, you know, these hunters are getting pretty disappointed because they spend all this money to come up here to hunt caribou and they ain't getting any. These guys did -- stayed there for 10 days and hiked over 50 miles, you know, between them all and they didn't get one caribou. So, you know, with the caribou, with the migration moving farther and farther east, you know, the -- they're already pushed that way. The only thing that these transporters can do is move east and -- farther east of us, maybe Anaktuvuk Pass or something and then they'll start pushing them back this way but I don't know if this is just a trend in their migration route or food. You know, we were supposed to have a meeting earlier this month but it got pushed to next month but, you know, I can't wait to hear, you know, what Jim Dow has to say and -- you know, and do all the -- look at all the readings on the all the collars that are out there. I just came back from Callahan earlier and I didn't see one caribou. I saw three sets of tracks and that was it all day today. I think that, you know, we need to -- I mean, all these entities, Fish and Game, Park Service, Fish and Wildlife, BLM, need to get together and, you know, have a meeting in each village and we need to get together and try and figure out, you know, why and, you know, what's going on with our caribou and I've gone hunting up there by the sand dunes and they're just not passing through there anymore. You know, they're -- I've gone to my father-in-law's cabin up there just down from Cabot Creek and there used to be caribou passing right in front of the cabin. Now they don't anymore, you know? I don't know -- I mean, we used to go hunt up in the Ugervik (ph) Channel up by the Camp Sivu (ph). No caribou over there anymore. They've moved farther and farther east, I think, than -- you know, either the damage is done or, you know, we can hope for the best and, you know, maybe this is just a little fluctuation in their migration route. So I -- I'm kind of anxious to hear what they have to say at the -- our next Fish and Game Advisory Council meeting. Thank you.</p>
Ram	E-mail	I have flown in and out of the Squirrel River area for over 25 years and have never had an

<p>Aviation, Mike Spisak</p>		<p>issue with any of our campers, hunters or fishermen having any contact with any local hunters or even coming into contact with any of them. Our only complaint from our clients are the multiple helicopters flying over and checking on the camps and the Alaska State Troopers supercub stopping in and checking them. We have to remember that this land is owned by the citizens of the United States and is merely managed by the BLM! We and other Air taxi/ Air Carrier operations provide an essential element to the owners of this land and that is the transportation of these owners to utilized their lands since air transportation is basically the only means for these owners to use it.</p> <p>This seems to once again be a gross mismanagement of the FEDERAL DOLLAR by even spending one minute addressing a problem that isn't real. The lower Squirrel river around Kiana is basically the only area that gets any local traffic during the summer and fall months. The Kobuk National Park, which is situated a short distance from the Squirrel River Special Recreation Management Area is accessible by boat, is over 1 million 700,000 acres and is used almost exclusively by the local people of the region for fishing and hunting. NO AIRCRAFT are allowed to operate in the Kobuk National Park for sport hunting. I feel limiting air transportation in and out of the Squirrel River would be a dis-service to the owners of the land that BLM which once again only manages is owed by the U.S. Tax paying citizens and not the local people proportionately.</p> <p>I think that a 1.7 million acre play ground is sufficient to support the recreational/subsistence needs of the local communities and people. Adding another 644,000 makes no sense, the local people don't use it, need it and can't access most of it without an airplane. Additionally the only months really in question are August and September and more specifically the last week of August and September making it a 5 week season. I don't think you would get much opposition if you limited the commercial activities November - July and allowed for commercial activities August, September and October.</p> <p>Since we are in the transportation business I would recommend getting rid of all the guides in the Squirrel River Special Recreation Management Area. This would cut down on probably all the conflict there.</p>
<p>J.P. "Jake" Jacobson, Alaska Master Guide #54, Arctic Rivers Guide and Booking Service</p>	<p>E-mail</p>	<p>I have used the Squirrel River drainage since 1967. Most of my usage has been dependent upon aircraft access to gravel bars and dry bench lands. Subsistence, sport and use by guided hunters, all were practiced there, by myself, my family members and guided guests.</p> <p>Wild resources harvested in this area include Dall Rams, Grizzly Bears, Black Bears, Moose, Caribou, Wolves, Wolverine, Arctic Char and Dolly Varden Trout, Grayling, various species of berries, etc., which were harvested by myself, my family members and, at times, by guided guest hunters, some of which were Alaskan residents, some were U.S. citizens from other states and some were non-resident aliens.</p> <p>Our use has always been of a transient nature, often times for a single day, many times for a day or two, using tents. No permanent camps or facilities were ever established.</p> <p>Locations we utilized were always away from areas accessible by boat. The remarkable increase in Transported sport hunters in this area has been controversial and, at times, problematic.</p> <p>I hope that BLM's "Multiple Use Policies" will permit a continuation of uses that I have been privileged to enjoy for these many years. I strongly recommend that parts of the Squirrel River drainage - those usually accessible by boat - be designated as "off limits" to aircraft transportation during times of the year when such access is available to local residents using boats, i.e. prior to freeze up. Restrictions to aircraft could, and should be placed on a seasonal basis.</p>

B. The impacts of making Off Highway Vehicle and other access and travel management designations.

Jeff Roach, ADOT&PF	Fairbanks Scoping Meeting	The traditional use of inter-community transportation is a concern for the users out there, like the routes between Kiana and Noatak. The Squirrel River has traditionally been used as a route to get between the two communities because of the low passes through the mountains and it's also -- has been used that way for aviation use as well and so one of the comments that I'll be making is regarding any kind of over-flight restrictions or limitations for altitude because VFR travel through there, when I fly through -- between Kiana and Noatak, I typically fly the Ko -- the Squirrel River and take that little pass that goes -- drops you down into the Noatak River. So that's a pretty common both land and air corridor for transportation through there. Yes, it's primarily a winter route for overland access because in the -- when it's not frozen, they go by boat, primarily. That's what we found anyways. Yeah, and since the transportation system out there is so undeveloped, you know, there is a need to continue to identify inter-community transportation in the future. If you're looking at transportation systems that develop -- I'll say unrestricted, inter-community transportation is usually the least difficult route and, typically, it follows river corridors or other lowland areas that allow for easy transportation from one community to the next community and if you look at Kiana and Noatak, that is the -- the Squirrel River is that corridor through there and so, you know, thinking future wise you know, that's -- definitely needs to be identified as a transportation corridor for those communities.
Pam Miller	Fairbanks Scoping Meeting	I think establishing your baseline on the vehicle tracks and figuring out a mechanism to keep track of that -- because in the tundra, those tracks will last forever and you may not detect the damage to the permafrost immediately but if that vegetation is removed, it can affect the permafrost layer and even 10 years later, you can get damage to the tundra. So I think, you know, that there are visual trails shows that there's been harm to the vegetation. If it's a high important area for lichens for the caribou, if it's really spread out in a big way, it could, potentially, have a long-term impact and, you know, just this land, once it's change, we're seeing it changed forever. So I would urge some sort of -- even if it's just a protocol for how BLM's going to keep track of this and decide what's a threshold for further action to be taken, it would be helpful.
Darcy Warden	Fairbanks Scoping Meeting	I'm with the Alaska Wilderness League and I have to say I would really echo almost everything that Pam Miller has already said. I think developing some type of system to monitor and track the off-road vehicle use and determine acceptable use levels out there would be really great
Unknown	Kiana Scoping Meeting	There's traditional trails that have been changed because of climate change, you know, but there's -- would be taken into consideration in this planning effort? How about migration paths for the caribou, can we put that down as a traditional path to kind of make it restricted to where it's for subsistence use only?
Unknown	Kiana Scoping Meeting	The recreational area you got, you set it up that way so that you could start regulating it. What's to say that you can regulate the hunters but how about if I got an air boat, are you going to regulate me for going up there how noisy that is or can I even go there with my airplane? Is that (indiscernible) for all of that or just regulating how many hunters go in there? I was just trying to get across to everybody that once you start regulating it, what -- what's to stop you? Where's the line? I mean, when is it going to say that you can't use the boat there? Understand what I'm saying? If we left it alone, does it stay like it is and we could do what we want or once you make it this recreational area, does it open us up for those limitations that we've never wanted and they're coming.
Unknown	Noorvik Scoping Meeting	Another concern that I have is there used to be a winter trail between Kiana and Noatak. Now, if this becomes a public use area, what restrictions would apply to those people who are traveling between here and Kiana and Noatak?
Unknown	Noorvik Scoping Meeting	Now, going back to the transporters and guides, do you guys limit the number of vehicles they use or the (indiscernible) used and like four-wheelers and stuff like that? Do you guys limit them? You know, transporters sometimes have one four-wheeler, you know,

		just to transport gear and the hunters in the plane.
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C. The impacts of making Special Recreation Permit management decisions.

Pam Miller	Fairbanks Scoping Meeting	And then I'm not familiar with your permitting regime for this area at all but, from the reviews of other ones that I've looked at from other federal land use managers, we strongly urge that some of the criteria and the conditions of permits be a strong criteria for the no trace camping style and their minimization of their operations from a noise -- you know, just a -- the quality of the experience that they're providing and then the kind of -- I think you could get at some of the issues related to kind of the discreteness of their operations. I don't know how exactly you would do that but the lack of conflict both in time and space with the subsistence hunters and this issue of the migration corridor, I hear whether it's the Porcupine caribou herd or the Teshekpuk Lake herd or the central arctic herd or the western arctic herd, it is an issue that -- it's a very real issue and I think the traditional knowledge that undergirds some of that knowledge about the kinds of things that may be affecting the caribou might be one approach to providing some additional basis of information in the EIS for that
Pam Miller	Fairbanks Scoping Meeting	Oh, I lost my train of thought. Oh, it has to do with the -- who the outfitters are and I think this obstacle, because of the master guide way that the industry has invol -- evolved in this state, it regulates. I suppose you could regulate the transporters as -- under the commercial support provision. I'm not advocating for it but I have seen that obstacle with recreational guiding, not so much. It's more by practice than because there's a -- there's not the same level of state guide outfitter licensing type situation but that does make it really hard for local people to get involved and there are people out there who may be interested and I think just that that issue should be one that gets addressed, where do new guides come from.
Unknown	Kiana Scoping Meeting	Yeah, because I was just wondering on Squirrel River side, you know, they've got some pretty good migration paths in there and it seems like -- well, the transporters like that big episode we had a few years back when they had the flooding and everything and so much for the hunters that were out there but we had a lot of local people, luckily, going out to go save them and everything but that was why I asked that if we can know where these people are, that we'd be able to go and assist if they had a serious situation. As it stands now, we don't track them. They drop them off wherever they want in that area and if there's any litter or anything, you can't even track that. So, realistically, if the guides have to report it, the guides have to take care of them, the transporters should also you know, for safety reasons because if I go to Chicago, somebody's going to take care of me down there. They come up here, nobody's going to take care of them up there, you know and I'd like to thank a lot of the people here that went up to go help save lives, people that were up there, you know? So I think that we need to put something in the ground there to make sure that they report exactly where they take all these people up and leave them so we can go back and -- or BLM can go back and make sure they do a cleanup also.
Unknown	Kiana Scoping Meeting	So they're -- that would be more than just guides but I think the issue in regards to the guiding issue, if you take a look at the land issue here, everything in yellow is BLM. State of Alaska might have something different than what BLM has. They have their own regulations in regards to how state lands will be managed. They can have more allowances of guides within that area than what BLM has within their area. There could be 14, as far as we know. If you take a look at the state guiding listing for the whole state, just in this region, I believe there's 84 guides registered to guide within the NANA region. That is a lot but they also are regulated. Even though they're regulated, there's only what, two brown shirts that

		<p>handle Arctic Slope, NANA region, the North Slope. So if there's a problem on this borough, that brown shirt might be over in Norton Sound. So the response time would be two to three days, depending on the situation. These are some of the things that needs to be considered and, on top of that, I think if you are addressing the recreational use area for the Squirrel, if there's any local guys that can -- that utilize the Squirrel, that option ought to be right on top.</p> <p>Right, if there's local guides, that option ought to be on top and everybody else's - - and they're sure there's state land. Those of BLM remember we're the residents of this region that impacts on the people, not somebody in New York, not somebody in California. Sure they come in with a lot of money. That's what they're -- that's what they do. They come, drop the money off, get their trophy and they leave. Sometimes when those types of people hunt on the Squirrel, they leave the meat. Then when Fish and Game comes, they blame the closest community for wanton waste. That's happened one too many times. I think there's got to be a change in the system to where people who do these things will be cited for those things. When people are attempting to be cited, they say oh, the bears took my meat. That's one of their biggest excuse. That's why the -- the weakest one. The bears were -- so it's the bears that's to blame and not them. So these are some of the things that also needs to be looked at but I think what's been talked about is if you could take a look at what -- what's in place, what some of the issues that people are bringing to the table, then take a look at that recreation plan, withdraw some of those things and incorporate their -- what their thoughts are into the area plan.</p>
Unknown	Kiana Scoping Meeting	<p>Through the years, we -- there was enough caribou for everybody in our region, migrating through our region, and when we all of a sudden found out there was a bunch of big game hunters that -- out in our back yard through our BLM meetings, we tried to create a date for them to open up their area and not go with the state (indiscernible) hunting regulation but to open your land, we wanted to create a date so we could -- you could open it a little later than after the caribou started migrating through and, through the years, we brought that up and nothing ever happened. I think that would be the best control that you could set up is setting a date for you to open up your land for hunting.</p>
Bobby Wells	Noorvik Scoping Meeting	<p>I have a comment to make. Yeah, my name's Bobby Wells and I was kind of maybe thinking that maybe we ought to have -- well, now we have restrictions like days that we could hunt at a certain time maybe that maybe these transporters could be a shorter time than we do as subsistence hunters, maybe like after Labor Day weekend, you know? Like a week after maybe transporters can start their hunting season because Labor Day weekend is like our Superbowl. We all go out and go hunting, then we need the land to ourselves to get our food and, you know, just stuff like that and I also made a statement too there a couple years ago that we only hunt on the south side of the shore, you know, where -- ourself to decide where the caribou is crossing the river and you all made a suggestion that maybe that caribou could be hurt too from Happy Valley hunters. There is a lot of sport hunters up there. That could be changing the migration also. Thank you.</p>
Unknown	Kotzebue Scoping Meeting	<p>Yeah, Shelly, just to maybe continue it, a couple public comments I got from the scene of people, listening to Attamuk, him and I had talked one time about the timing of the caribou and I'm starting to think well, there's salmon escapement, right? You can't -- salmon fishing is closed sometimes until they -- the biologists kick an escapement and then they open salmon fishing after so many salmon have escaped and we thought why can't we take that same model and apply it to caribou. There should be a caribou escapement which is a big part of the testimony that's been made by previous hunters that you let the lead caribou go through. The rest of the herd will go through the scent trail and that what -- they'll follow the leaders. So getting away from this timing window that is always very difficult because every year is different and, you know, if the weather's warmer, they like to go on a school, like when the mosquitos die off so</p>

		<p>they're not going through these valleys when there's a lot of bugs. You know, so the weather and the insects that are there make a big difference to when they choose to go through different areas and so -- I mean, like a caribou escapement, I know this might be larger than your plan but I think it should be put on the table as part of your plan that the caribou escapements makes a lot of sense and there's a model for it already in the state, there's salmon escapement.</p> <p>The other piece I wanted to mention is that I think that part of this plan, even though it's recreation, cultural preservation probably needs to be mentioned, as Pleshup (ph) was saying earlier. You know, there's place names, there's hunting areas. Enoch was even referencing, you know, knowing caribou migration routes, you know, and there's a lot of knowledge that can be documented as well as language preservation. So I think that needs to be put in the plan as well so it might be a very broad goal but it needs to be part, I think, of the plan.</p>
Attamuk Sheidt	Kotzebue Scoping Meeting	<p>Okay. Attamuk again. My train of thought came back. I forgot to mention that when the transporters and outfitters are out there getting their horns, what are you going to do with the meat? Are you going to enforce the law on wanton waste or what are you going to do? You know, we seen a lot of antlers pass through Kotzebue and the meat is not taken but we don't even know where it is but we need to have your enforcers out there saying they're wasting meat and they need to be cited and the target at sometimes all us being Natives. I think you have to worry because if being wasted and the timing also have to be -- if it's too warm, maybe a couple days is all they could last, the meat, and it's waste from there and, as it cool off, the meat will take longer to spoil and some of these people that don't know anything will bag their meat in plastic bags and it's no good from the day on. So I think you not only need to worry about the transporters and outfitters, I think you need to do -- they're wasting the meat and we're -- as Natives, we're not allowed to say -- waste the meat. We need to preserve it or we would be cited for wanton waste. So you have to look into that too same time. Thank you.</p>
John Bithos	E-mail	<p>Further action in Area 23 is unnecessary. Constant erosion of access has been a glacial but ever progressing theme in Area 23 ever since Dau became the area biologist.</p> <p>No action should be taken....period.</p> <p>That said, if any action is taken, it should consist of eliminating all guide permits, and zero out all non resident hunting opportunity.</p> <p>This will provide ample opportunity for those willing to do the work of hunting the area...and IAW our state constitution not discriminate against equal Alaskans.</p> <p>It will also have economic impact on a large part of the Alaskans living in area 23...but they pretty much are begging for the damage in their ignorance....and after this action, and further action to take the area completely off the federal tit, within 10-20 years access won't be a problem again since the population base out there is not otherwise supportable and will starve/move to urban Alaska...or outside.</p>

D. The impacts of classifying the Squirrel River as an SRMA.

Unknown	Kiana Scoping Meeting	Them Kiana people that worked pretty hard on the wild and scenic river [report] and one reason -- one main reason was, you know, bringing in more people and people floating the river. If this becomes a special recreational area, that would bring in people also.
Unknown	Noorvik Scoping Meeting	I don't see where you want to put this into -- turn this into a recreation district because the last few miles in this river are real shallow. You can't get up there with a motorized boat and what effect will this recreation thing have on mining?

E. The impacts of recreation and travel management decisions on hunting, moose and caribou populations, access to inholdings, and the local and regional economy.

Unknown	Kiana Scoping Meeting	One of the comments that was brought up during one of the meetings here in Kiana was could you do a corridor for caribou to go through, either a 20-mile corridor or a 15-mile corridor where no camps in, either a bachelor's (ph) camp where hunting camps would be within that area? That was one of the ideas that was brought up.
Unknown	Kiana Scoping Meeting	The only thing that -- I mean, the Squirrel River Valley is not very wide. I mean, we don't want a 20-mile corridor. That would shut off everything.
Unknown	Kiana Scoping Meeting	I think that's an issue in regards to how the state then manages our resources within the BLM lands and we have to seriously consider, you know, just the fact that the State of Alaska and how it manages resources. It manages resources based on the Constitution, the equal protection clause, which means that for folks that depend on the resource here, that have the need for that source really sort of get stuck on the bottom of the ladder. I say that because the State of Alaska will say no, it's everybody's resource so we're going to allow these things to happen first, then these people. You know, when the State of Alaska is out of compliance with ANILCA but yet the federal system allows the state to manage resource when, under the provisions of ANILCA, these folks are protected under those provisions but yet the federal government allows the State of Alaska to manage resource. I think it's time that the federal system start looking at managing resources. You take a look at the cost of living within this region, within this area. Transportation cost is high. Fuel cost is high. You take a look in going to Kotzebue from here. What is it, a hundred and -- 120? 140 one-way ticket from Kotzebue to Kiana. That's \$240 bucks roundtrip, fuel costs at what? What's the price of gas? \$6.50 per gallon. Transportation of products from Anchorage, I use this example. Two years ago, I needed a shovel to shovel my yard of snow. I bought a \$48 shovel from AIH and guess what it cost me to ship it to Kotzebue? \$104 from Anchorage. Just imagine that same product into Kiana. Probably over 200 bucks by the time it hits Kiana. That's the transportation costs I'm talking about but yet these people have to live with that. On top of that, when it gets to resources, there's a creation of competition from the state and federal side because of the allowances that you have under the regulations. Several years ago, you and I talked about the very problem on the Squirrel in regards to transporters. Those very times when I had conversation with you, no, we're not going to do nothing until we come out with our area plan. It wasn't until last year, you folks finally responded to some of those issues and concerns. Prior to that when migration of caribou was abundant, that was when deflection was being made upon the head (indiscernible) of the Squirrel to where the first migration herd of caribou would be coming down, they get deflected by the very hunters that were dropped upon on line. They get deflected. They go up further east which means for these people additional gas and additional food. That's extra cost to them. For those folks that get dropped off, that was easy for them. On top of that, last year, the working group for this region made a recommendation to Department of Fish and Game for two proposals. One proposal was to enlarge the control use area for Noatak. The other regulation proposal was to increase the take of caribou from one to two for outside hunters. The proposal for control use area was rejected and they adopted the increase of take of caribou to two for outside hunters and that's the message that we got from the State of Alaska. Yes, we heard you but we also have to apply equal protection clause of the Constitution and that's why they adopted that proposal to take two and not too concerned about the local concerns. That's what we bark about, that's what we talk about. The way of life of these people is being suppressed continually and I think it's time that the State of Ala -- not the State of Alaska, that the federal government take a look and consider some of the very issues that are being talked about here tonight, seriously consider. We had Park Service that really had the management to take care of the transporter issue. That very superintendent is not with us

		<p>today because of that very problem. We barked to him for the last several years. He had the responsibility to manage within the preserve but he wasn't managing within the preserve. His management came from the Solicitor's office in Anchorage in regards to how recommendations are being made. He listened to the lawyers in Anchorage and say how this is how the preserve is going to be run in regards to resources and that's exactly how we managed. One day I got so re -- I was -- I got so irritated, I said George, you can't manage, you must take a look at going somewhere else. If you don't consider the impacts on the way -- on the life -- on the way of life of people, you might as well go manage somewhere else and he took that to heart and he's gone this fall. That's why Mary is acting superintendent right now and she wants to listen and I was glad that she willing to listen to some of these issues and I'm glad that you are listening to some of the concerns like Mary and that's the style that the federal system brings to the table for us. I think it's time that we take a look at, seriously, the impacts that your management has in regards to their way of life and it does have an impact, especially for some of the widows or widowers that don't have the means to buy. People share here. They're not going to see somebody starve. They share what they catch. That means less for some of the families because they're sharing with someone else. These are things that we need to make sure we consider.</p>
Unknown	Kiana Scoping Meeting	<p>Shelly, you talked about economic, you know, went through and checking out what the costs are and maybe it's -- you're beginning to add that to your study to see what the economic impact is on some of the people when they (indiscernible), sometimes overall. I would say a good, you know, eight to \$900 just buying gas. You know, that's just for gas. That's just going up to like Ambler or someplace and making sure that they can get back to Kotzebue. Well, there's people that have to do that in order to provide caribou meat for their family and their relatives and, yeah, here in Kotzebue, they have to go all the way up to Ambler to take caribou, then they have to bring it back and it's there for the (indiscernible).</p> <p>And, you know, this is \$6.80, I believe, a gallon so if I get 60 gallons that's 600 to \$800 and that's not counting buying groceries or, you know, if you're going, you have to have them for three or four days. So, you know, it does have an impact on how much people [have].</p>
Unknown	Noorvik Scoping Meeting	<p>I've been looking at this map here. This area that you have highlighted here, I see in the migration route of the caribou for many years. I -- right -- I -- all of Kiana, Noorvik, Selawik, Kotzebue hunters, they hunt on the Noatak -- I mean, the Kobuk. I've heard many times some comments made about we don't have the luxury of flying up there, putting a camp up there and hunting like the sport hunters. We wait on our village and the more activity we see within this -- if this becomes a public area, I wouldn't want to see that because, you know, caribou is somewhat a wild hunt. You see somebody, it'll go through another lull. This summer, we don't know what happened but caribou didn't go through our area and it was a hardship on many families without caribou harvest in the fall. Wild hunting's very important for our people here and we hunt in this area here in the riverside. That's where we hunt. So that's a big -- that's right smack in the middle of the migration route. I think this impact on us is there's going to be a very serious -- if this becomes a public area for more sportsmen, you know, and guiding hunting to be hunting in the area.</p>
Unknown	Noorvik Scoping Meeting	<p>I suggested that we have a 20-mile corridor going through the park on. That way the caribou can go through, you know, because Noorvik people go hunting, they'll go -- Kiana also for caribou so that would be -- that would [be good].</p>
Unknown	Noorvik Scoping Meeting	<p>Shelly, generally, I hear what, you know, you probably want (indiscernible) certain time they'll come around here and we need to protect the migration route and remember the people on this site, you know, who look out for the caribou and you look out for the number of mooses well, I'm certain, you know, and bear and all of that but, you know, look out for the migration route. I think that's what we're probably wanting to put on the plan. Yeah, I don't know what else, you know.</p>

F. Climate Change

Pam Miller	Fairbanks Scoping Meeting	finally, again, I'll mention climate change. I think because Fish and Game is the ones doing the regulations -- some of the regulations -- anyway, because of the complexity of the hunting rules, timing and space and number of animals, I think the issue of having a mechanism that kicks in that addresses is this becoming a different time to address the issues you were talking about of the quality of the meat, are the animals where they need to be. Maybe they're not coming -- they're coming so much later in the process that it is going to be harder to have the commercial hunts and the subsistence hunts but getting some -- the baseline and a process for dealing with that information, from the subsistence side as the land manager, I think you could do it in the plan.
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G. Wildlife and Fisheries

Pam Miller	Fairbanks Scoping Meeting	I strongly urge the -- as soon as possible the mapped information on -- that you have available on the western arctic herd -- caribou herd get distributed to the interested parties so that they can consider issues like you raised of the quality of the meat, the timing of the hunt, how climate changes might be affecting this, how changes due to increased tundra fires and how that might be affecting the quality of the lichens in the area and then the migration routes of the caribou because of that, the changing in their wintering grounds or their migratory grounds.
Pam Miller	Fairbanks Scoping Meeting	And then I don't know if there's issues having to do with fish and fishing and fishing management and the protection of the water quality for the -- you know, just the quality of the river that might be appropriate to address here.

H. Mineral Entry

Pam Miller	Fairbanks Scoping Meeting	I'm Pam Miller with Northern Alaska Environmental Center and I'll make a few general comments and then a few more questions I think that the plan should address. This is a step-down plan from your Kobuk/Seward plan and we're quite concerned about the decision on that plan to lift D-1 withdrawals and -- which I believe was made. If it was made, I urge you to reconsider that decision for, at the very least, this planning area and -- because you are doing more intensive planning and, preferably, for the whole of the Kobuk/Seward plan because we were not satisfied that there's an adequate regime in place for the kicking in of the mining law of 18 whatever it is... '72 and the proliferation of mining claims that may occur in a very big hurry if there's a blanket withdrawal of the D-1 withdrawals. So, at the least, for the areas that are bordered by the BLM lands as well as this planning area, it would really make sense to -- this plan is being done because there was already some pretty intense issues about user conflicts and resource cumulative effects in a way and adding that additional layer of mining activity in this area, presuming that there's minerals in this area that somebody may want to go after or routes for minerals on the adjacent lands that might tie in.
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I. Planning

Unknown	Anchorage Scoping Meeting	Do you think the upper level management of BLM realizes that you're considering a substantially fundamental shift in resource management for all state lands? Do they understand how far-reaching your considerations of doing here are going?
Unknown	Anchorage Scoping Meeting	I think the basic fundamental issue is that the BLM needs to do a professional job at defining impact and ANILCA clearly protects subsistence hunting opportunity. Okay? This moving in, this -- well, I don't why you would even want to consider to getting involved with favorite time and location conflicts. That is an ambiguous term. It can't be quantified. It can't be qualified. It is a very arbitrary determination and why you would

		<p>even want to get into that I can't imagine and it's basically what you're saying is the issue in the Squirrel River because you know there's -- it's not a biological issue. There's plenty of game. You're just saying the negative impacts of this guy who wants to hunt at this camp can't hunt at this camp. Thus, that impact is to the point that you need to restrict access. Favorite time and location conflicts. These are very dangerous territory for you to go into because guess what? As the Native community expands on the Kobuk River, village and village are going to start fighting. Oh no, this was our village's hunting ground up in there back a hundred years ago, not these guys's village's. You got to restrict them because they're coming over and hunting our moose on our river. It'll come. Just go to the federal subsistence board and up. I've heard it over and over and over, villages fighting between themselves over favorite time and location conflicts.</p>
Unknown	Anchorage Scoping Meeting	<p>Well, where does the consideration come though when for the fact -- I mean, the State of Alaska manages hunters with seasons and bag limits and that's the -- it -- that -- once a person has been -- bought a hunting license from the State of Alaska, they have a right to go to those federal lands and deal with whatever camp situation there is there and use that opportunity to access that resource and for the federal agencies to say -- intervene in that authority, I mean, and call it and ide -- for ideological reasons, I mean, that's a very fundamental issue that you got to get past. You got -- you have to be able to justify how to get past that. I don't see how you do, the federal -- and I also don't know why the state's not here telling you the same thing.</p>
Unknown	Anchorage Scoping Meeting	<p>I think it's important to note that when you look at that transfer map over there, the Squirrel River is going to go to state lands. So, you know, pretty much the entire corridor along the river could get conveyed to state. So if you don't even have cooperating status with the state, I would question too how effective you're going to be in the long run. I think when you've got a situation where the state is going to basically take over the prime territory here in -- within the next decade that you guys better sit down and hammer it out, you know, how you're going to deal with this issue and make sure that once they take over, they don't just send all this hard work you're doing now down the old dump, you know?</p>
Unknown	Anchorage Scoping Meeting	<p>How do you do that, good beer and bad beer? You know what I mean? The person taste of an individual defines what beer they like to taste. The personal values of the individual define what is a quality hunt and what is not a quality hunt and if you're going to restrict access based on your opinion of what is high quality and what is not which is an arbitrary, ambiguous definition that you cannot put numbers to -- you can't draw on a sheet of paper this is high quality, this is low quality -- you know, you're just going down a never-ending conflict, never-ending. It will never stop and if you're going to manage users -- if you're going to manage access to a public resource like that, you need to base it on the individual and not on industry. What if you restricted both air taxis? Okay? You're restricting all access because that's the problem on the Squirrel River? Well, hunters all of a sudden will pay a higher price than a rafter. So all of a sudden all -- the hunters get all the air taxi access because they're willing to pay a little more to go in there. The poor rafter or the poor photographer, you know, he's kicked out. His entire user group is gone now because you've given -- you've profitized that seat to an industry. You're not getting to the root of the problem even if it's a perceived problem, even if it's an ambiguous problem. Going after an industry does not fix the issue on the ground and you'll never fix favorite time/location issues. There'll always be somebody who's pissed off, you know? There'll always be somebody in that village that wants to be able to go for 10 days straight up and down the whole river and never see another person and that to them is the threshold of high quality for them. So keep it based on science. Use the tools that NEPA gave you and 810 is your strongest tool. Use it.</p>
Pam Miller	Fairbanks Scoping Meeting	<p>I don't know if in this region there's a relevant federal subsistence advisory committee that you've been contacting but I didn't see it in the list of parties that you would be consulting with.</p>
Darcy Warden	Fairbanks Scoping Meeting	<p>I think what I would really like to do is encourage you to conduct 810 hearings even if you don't get the three indicators that you need in order to say okay, let's do the 810 hearings being that this is a subsistence-based issue, subsistence and guides. So I just -- I</p>

		would strongly encourage the 810 hearings.
Unknown	Kiana Scoping Meeting	Shelly, would it be more effective to do it like say every five to -- five or 10 years, to take a look at your management plan and then see how things have been over, you know, five to 10 years? Maybe, you know, things will change and I guess we'll get a better idea of how best to manage BLM lands and I know in the Selawik National Wildlife Refuge, they have to do theirs every 10 years. Why doesn't BLM do it like them, like every 10 years, because, you know, 20 years from now, some of these people aren't going to be here then, you know. So, you know, they'll know what's going on in their area so, you know, that's probably more reasonable criteria.
Unknown	Noorvik Scoping Meeting	How seriously do you consider or recognize Title 8, ANILCA act, subsistence preference, rural preference? How seriously do you recognize that as you're planning?
Unknown	Noorvik Scoping Meeting	I think any piece of planning for development in a plan should be brought to us here in person so that even if you have a (indiscernible) here, someone will have a knowledge on that. If you make an effort by BLM, you know, to come to us and inform us on the -- before the final adoption of this plan, you know, we -- it would help more then.

J. Other

Unknown	Kiana Scoping Meeting	Maybe we could put a BLM pay phone up there somewhere.
Unknown	Kiana Scoping Meeting	I had a related question was this, has BLM established any similar management areas such as this and, if so, what has happened to the activity level and does it require a BLM presence in the area? For example, would you have to have a field office here in Kiana? Can we request it?
Clarence Jackson	Noorvik Scoping Meeting	<p>My name is Clarence Jackson, born and raised in 1928 at Kiana, Alaska. As far as I remembered, both Kiana people and Noorvik people would be going up the Squirrel River way up to the North Fork or even above and some of our relatives got allotments up there. My brother, Henry, got an allotment on Fort -- what was it called up.....North Fork, yeah, and he's got a cabin there and every summer, every spring when he went up there, there's always been somebody with a plane. A bunch of people up there have party on his camp allotment time and we'd like to see that stop, party up the party with the booze on somebody's allotment. If the federal government had a place like that, if I do bring up the booze up there, what would I receive, to expect? Shotgun hole in my head. That's what would happen to me.</p> <p>I also got an allotment up there. Like I says, I would like to see those residents of Kiana and Noorvik still -- would still use that hunting and subsistence up there at Squirrel River. That's where I was born and raised but when I become an old man like this, I could hardly go anywhere now. Thank you.</p>
Unknown	Noorvik Scoping Meeting	Shelly, you guys talk about the Squirrel River special recreational management areas. Would it be too much (indiscernible) to create maybe rangers for this area to monitor these transporters and hunters and -- you know, so they could report to you what's going on and also report to the community that are affected by these hunters like Noorvik, Kiana, Ambler, Kotzebue and Noatak? Because, you know, you could hire, you know, three or four people for, you know, say 40,000 a year during the hunting season and then provide them with gas, you know, an airplane, you know, to do monitoring to land in areas to check on these hunters and see how they're using the land. So, you know, would it be too much to ask for you guys to do something like that?..... With that amount of money, you know, we could hire maybe two people to do, you know, that kind of work during the season. You know, 150,000 goes a long ways. Hiring two people, you know, providing a boat, you know, an airplane, do charters and stuff like that, you know, we could hire two people to do monitoring for that amount.
Marlene Motokai	Kotzebue Scoping	My name is Marlene Motokai (ph) and I'm calling from Dilling and my concern is the state and federal fishing, them people never learned a lesson from this -- what's happening

	Meeting	<p>here and that none of them stay at peninsula. First off, when you took off with the caribou and when we did it however in here, there was an some (indiscernible) other people what - - other than the -- when they let us to shoot the reindeer. Now, the reindeer make (indiscernible) and everybody got the access to it, even down in -- my son down in Clark's Point that oh, (indiscernible) make me happy too all right but it's not too (indiscernible) when things like this -- you know, the -- it's kind of hard of the -- because of the reindeer and (indiscernible) peninsula done that they go after it and that somehow it -- it's something with the muskox. The muskox, then they're different. They (indiscernible) hunters more and more now than from -- on the outside than the people that live there don't even have a chance to get one -- two or three of the muskox. Anyhow, then they put us generalized and then the moose, any concern on moose is (indiscernible) and -- but there used to be moose up here there -- in the (indiscernible) and then several years ago, it was (indiscernible) the -- what they call them spot get the -- a bunch of overkill and (indiscernible) the caribou and moose hunting and then if you look in the advertisement -- I think I mentioned this last year when you guys -- or a couple years ago -- (indiscernible) airplane and five or six hunters is all (indiscernible) in there and my concern is that reindeer, caribou, is there any -- anything Fish and Game or federal -- (CD cuts out) and hunting reindeer anymore and one more thing is I don't know if you guys talking about the ocean or the beluga. Back in the late seventies, early eighties, then (indiscernible) from here anyway to Elephant Point and now they disappeared. (Indiscernible) and my dad got a sea lion before. Okay. Good luck and keep us -- let us know what's going on in Fish and Game issues because seems like we're -- (indiscernible) the stuff here and (indiscernible) cooperative and nobody cares anymore. Okay. Thank you. Good luck.</p>
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K. Comments from Specific Interest Groups Covering Multiple Issues

<p>Alaska Miner's Association</p>	<p>Written</p>	<div data-bbox="505 275 574 384" data-label="Image"> </div> <div data-bbox="597 302 1190 342" data-label="Section-Header"> <h3>ALASKA MINERS ASSOCIATION, INC.</h3> </div> <div data-bbox="597 340 1190 361" data-label="Text"> <p>3305 Arctic Blvd., #105, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9225 • www.alaskaminers.org</p> </div> <div data-bbox="548 411 649 432" data-label="Text"> <p>June 10, 2010</p> </div> <div data-bbox="548 449 1115 548" data-label="Text"> <p>Bureau of Land Management E-mail: AK_CYFOGeneral.Delivery@blm.gov Central Yukon Field Office Fax: (907) 474-2282 Attn: KSP/RMP 1150 University Avenue Fairbanks, AK 99709-3844</p> </div> <div data-bbox="548 562 1149 623" data-label="Text"> <p>RE: Scoping comments concerning amendments to the Kobuk-Seward Peninsula Resource Management Plan (KSP/RMP) - Squirrel River Special Recreation Management Area (SRMA)</p> </div> <div data-bbox="548 638 623 659" data-label="Text"> <p>Dear Sirs,</p> </div> <div data-bbox="548 674 1149 869" data-label="Text"> <p>Thank you for the opportunity to provide scoping comments for the proposed KSP/RMP/SRMA amendments. The Squirrel River SRMA includes and is proximal to known mineral resources of high interest to the Alaska mining industry. The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and work throughout the state and many have explored in and adjacent to the Squirrel River SRMA.</p> </div> <div data-bbox="548 884 1149 1024" data-label="Text"> <p>The Alaska Miners Association supports BLM efforts to analyze the impacts of land use plan-level decisions and implementation plan-level decisions proposed for the Squirrel River SRMA. We understand that the focus of this effort is to determine proper use levels, visitor numbers, recreation administration and travel management as they affect subsistence, wildlife, and the local economy. It is essential that the BLM also considers the potential effects of any proposed amendments on the exploration for and potential development of locatable, saleable, and leasable minerals.</p> </div> <div data-bbox="548 1039 695 1060" data-label="Section-Header"> <p>Scoping Comments</p> </div> <div data-bbox="574 1075 1149 1213" data-label="List-Group"> <ol style="list-style-type: none"> 1. Revoking withdrawal orders issued under Section (d) (1) of ANCSA. The BLM proposed, in the Kobuk-Seward Peninsula RMP/Final EIS, the revocation of all remaining ANCSA (d)(1) withdrawals in the planning area. This is extremely important and BLM should redouble its efforts to accomplish that goal. Such action would remove a significant level of uncertainty for businesses and encourage mineral and energy resource exploration in the area. This could which then result in needed economic diversification and benefit to the region. </div>
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2. Including Effective transportation provisions. Broad latitude should be included to allow for new transportation infrastructure to be developed in the most feasible ways possible. There is a need to establish a straight-forward predictable process for future infrastructure planning and development. It cannot be known today exactly where and what types of transportation infrastructure will be needed. Therefore, an infrastructure planning process that will readily accommodate future transportation needs and allow infrastructure to be developed responsibly and efficiently is needed.

3. Scope of the plan amendments. We note that the “plan will address only the BLM lands within the Squirrel River SRMA”. It is important that the BLM consider the impacts of any amendments on adjacent state lands, private lands, including Native lands, and inholdings as they might affect access to and/or development of lands owned or managed by others.

4. In no case should the closing of lands to mineral entry or added restrictions be considered. This part of Alaska is already covered predominantly with conservation system units that preclude any commercial activity that could create new family-wage jobs. All efforts should be focused on removing provisions that hamper creation of new jobs.

Sincerely,



Steven C. Borell, P.E.
Executive Director

State of
Alaska

Written

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT & PERMITTING

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December 13, 2010

R. Doug Herzog
Planning & Environmental Coordinator
Bureau of Land Management
Northern Field Office
1150 University Avenue
Fairbanks, AK 99709-3844

RE: Kobuk-Seward Peninsula Resource Management Plan Amendment for the Squirrel River Special Recreation Management Area

Dear Mr. Herzog:

The State of Alaska appreciates the opportunity to offer comments and provide information in support of preparation of the Bureau of Land Management (BLM), Kobuk-Seward Resource Management Plan (RMP) Amendment for the Squirrel River Special Recreation Management Area (SRMA).

The planning effort covers an area with diverse user groups, unique characteristics and concerns, as well as many valuable resources. We recognize that the RMP amendment will address recreation and travel management decisions and will likely result in an associated environmental assessment (EA). We appreciate the BLM's continued commitment to work with the State and others regarding planning on BLM administered lands.

LAND STATUS

The SRMA planning area is affected by both a municipal selection by the Northwest Arctic Borough and state selections. There are lands within the scope of the Squirrel River SRMA plan that are state patented, tentatively approved, and selected lands, including top-filed lands. Significant portions of the planning area have been conveyed to the State, and it is expected that additional areas will be conveyed within the next several years as BLM adjudicates the remainder of state selections. It is in the public interest that the management transition be as seamless as possible when conveyance occurs. The State requests that the planning process avoid making decisions that unnecessarily encumber state selected lands. Even prior to conveyance, BLM management intent for selected parcels should be as consistent as possible with state management intent. Under ANILCA 906(k), the State must concur with authorizations on state-selected lands. State concurrence is based on DNR plans as well as other state policies, regulations and statutes that address selected parcels.

We have attached an updated land status map. Please note that the lower portion of the Squirrel River no longer contains BLM administered lands. Native Corporations own most of this area through patent or interim conveyances and the remainder is State of Alaska tentatively approved. Additional lands along the North Fork Squirrel River are also state tentatively approved. We request BLM acknowledge that these lands will not be retained in BLM ownership and are therefore outside the scope of this planning process.

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."

Other State land selections exist at the headwaters of the Squirrel River. BLM should manage these parcels, which were selected in 1993 and again identified by the State as high priority in 2008, consistent with State land use plans. Congress provided management direction regarding state land selection in Section 906(k) of ANILCA, which states, “the Secretary is authorized to make contracts and grant leases, licenses, permits...” if “the State has concurred prior to such action by the Secretary.”

When these state-selected lands are tentatively approved to the State, they will remain open to public recreation use as per the Department of Natural Resources Northwest Area Plan (NWAP). The NWAP identifies recreation as a co-designated use in some management units and as an allowable use within all the plan designations in the Squirrel River drainage. The NWAP does not affect the generally allowed uses on State land (11 AAC 96.020). Aligning the SRMA management intent for these state-selected parcels to be consistent with the NWAP is clearly in the public interest. As previously mentioned, it will benefit the State, BLM, and the public if the management transition is as seamless as possible when conveyance occurs. Therefore, consistent with 43 CFR 1610.3-2, we expect that this plan will not develop management intent for these lands that deviates from the existing DNR land use plan. The Northwest Area Plan can be found on line at: http://dnr.alaska.gov/mlw/planning/areaplans/northwest_amendment4/

Please note also that much of the Squirrel River in this planning unit has been found to be navigable and as such, the bed of the river belongs to the State of Alaska.

FISH AND WILDLIFE RESOURCES

The Department of Fish and Game serves as the primary agency responsible for management of fish and wildlife on all lands in Alaska regardless of ownership. Clarification of this role and a commitment to cooperate in related matters is addressed in the Master Memorandum of Understanding between the Bureau of Land Management and the Department of Fish and Game. The State requests that the respective roles and a BLM commitment to cooperation in issues that affect each other’s responsibilities be fully recognized in the plan. Specifically, the State requests that the plan and planning process fully recognize the State’s authorities that overlay BLM’s land management responsibilities.

The State is keenly aware that fall hunting in Game Management Unit 23 (GMU 23) has been the subject of user conflict since the early 1980s, primarily between local area residents and non-local hunters transported by commercial transporters. We also understand the BLM faces considerable pressure to act regarding this complex issue. The State supports resolution of this conflict.

The GMU 23 User Conflict Working Group (Working Group) is working toward solutions to issues associated with fall hunting. To date, the Working Group has submitted proposals, recently approved by the Alaska Board of Game, to alter the timing of the Noatak Controlled Use Area and require education on local issues for pilots carrying hunters into GMU 23. The Working Group also recommends expanding the Big Game Commercial Services Board (BGCSB) authorities to regulate transporter numbers and use areas. In addition, independent education and communication programs have shown progress in combating wanton waste. We support these efforts and trust the BLM does as well.

Please note that conceptually, the State prefers and seeks solutions that rely initially on the least restrictive management tools, phasing in additional regulatory solutions only when necessary and when other less restrictive solutions have been proven ineffective. So that BLM planners are better versed on management intent for state lands in and adjacent to the planning area, a brief compilation of the land and resource management tools that state and municipal governments may apply to public activities involving state land, water, and related use of fish and wildlife resources is attached.

OTHER RESOURCE VALUES

We request that the plan also consider the potential for oil and gas exploration in the SRMA. There has been some historical oil and gas exploration in the area; however, exploration has been primarily offshore. The State maintains the right to conduct seismic surveys and conduct further exploration to determine whether or not oil and gas resources are present.

Additionally there are mineral claims and interests that would be impacted by changes to current regulations. The Squirrel River SRMA includes placer mining sites at Central, Baldwin, Klery, and Gold Run creeks. Copper prospects are scattered across the area plan, with the most significant prospects covered by an extensive mining claim block at the Omar, Frost, and Powdermilk prospects on State lands in townships K 024N 010W and K 024N 009W. Access across Federal lands to State lands within the Squirrel River SRMA may also be impacted by amendments to the RMP. We request that BLM consider the need for continued access to State land and resources and ensure that alternatives considered address this need.

Please note that planning and activities undertaken within the SRMA need to comply with Section 106 of the National Historic Preservation Act. Care should be taken when planning travel routes and other ground disturbing activities to address and not disturb cultural resource values. The State Historic Preservation Office is a valuable resource. In the event that archaeological or historical sites are identified through this planning process, the State requests that the State Historic Preservation Officer be notified.

We request that the planning effort consider the effects of proposed actions on water quality and if necessary recommend alternatives or actions designed to protect this valuable resource. For additional information regarding actions to protect water quality please see the attached Recommendations prepared by the Alaska Department of Environmental Conservation.

The State is pleased that BLM will be considering the effects of recreation and travel management decisions on the local and regional economy.

TRANSPORTATION

Transportation corridors are vital to economic growth, commerce and reasonable access to goods and services. The State needs to ensure that adequate transportation corridors are retained in the Squirrel River Special Recreation Management Area. Even though there may be no right-of-way exclusion areas in the planning area, other management actions can preclude positive determinations for rights-of-way and transportation corridors if they are not specifically identified in the resource management plan. Transportation corridors need to be a minimum of 600 feet from the centerline to address alignment, slope development and other engineering requirements. Additional factors related to retaining expansive transportation corridors is the requirement for associated utilities, rest areas, pullouts and other associated transportation facilities.

Historic inter-community travel between Kiana and Noatak, along the Squirrel River, needs to be recognized and a transportation corridor protected. Use of the travel corridor between these communities pre-dates designation of the Squirrel River Special Recreation Management Area. Safe and efficient travel between these communities is vital to local residents.

Back country airstrips and unimproved landing areas (ridgelines, gravel bars and lakes), again pre-dating designation in many cases, should be identified and designated for future use. Backcountry airstrips and landing areas provide access to important areas for recreation, mining, and other public uses. Unimproved landing areas have provided access to large roadless areas for decades and are important components of a developing rural aviation system.

	<p>It should also be noted that access to and through the area included in this SRMA is still developing. Recognizing the need for transportation, while addressing potential conflicts with management actions, is vital to meeting public access needs. We request that historical transportation uses and rights of way and transportation corridors be identified in this plan.</p> <p>The expanding OHV trail system in the SRMA has increased the success rates of hunters in the SRMA. New trails may begin to push into areas that provide important habitat for moose and caribou. However, given the current level of OHV use and conservative management of these resources, the Department of Fish and Game is not concerned about the sustainability of either the caribou or moose populations. The Department of Fish and Game will continue to monitor this use to determine future management needs.</p> <p>The impact on local transportation costs is another factor to address when considering limits on transporters. The overwhelming majority of hunters (both resident and nonresident) utilize commercial transporters to access the SRMA when hunting caribou, often in conjunction with a regional hub commercial flight. If the number of commercial transporters is substantially limited by BLM, market economics may lead to a significant increase in transportation service costs due to limited competition.</p> <p>Potential limits on public access within the SRMA may also displace hunting pressure to other portions of GMU 23, which could interfere with the Alaska Department of Fish and Game's ability to manage wildlife populations. It could also lead to displacing conflict elsewhere without improving the overall issue as perceived by the user groups. To address this concern, we request the BLM closely coordinate with the State throughout the planning process. We encourage BLM, as well as other federal land management agencies in the region, to "coordinate their planning and management to the maximum extent possible." (Working Group, January 2009) Moreover, we recommend the BLM provide a draft set of alternatives to local and non-local constituents prior to the formal comment period to better ascertain and address public sentiment.</p> <p>Additionally, the Bureau of Land Management must develop the plan in accordance with the provision of the Alaska National Interest Lands Conservation Act (ANILCA, P.L. 96-487). Provisions of ANILCA relevant to this planning effort include Sections 811, and 1316(a) among others:</p> <p>Section 811 of ANILCA, addressing all federal public lands in Alaska, states that:</p> <p style="padding-left: 40px;">"the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation . . . "</p> <p>In addition, Section 1316(a) allows:</p> <p style="padding-left: 40px;">"On all public lands where the taking of fish and wildlife is permitted in accordance with the provisions of this Act or other applicable State and Federal law the Secretary shall permit, subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities . . . "</p> <p>We request that the BLM work with the State to determine traditional routes of access, identify necessary access to state lands and waters, and identify appropriate measures to protect sensitive areas such as wetlands and stream crossings. Additionally we request that BLM consult with the State to ensure that appropriate steps are taken to address the implications of ANILCA on Travel Management.</p>
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	<p>Coordination with the State and consideration of appropriate ANILCA provisions throughout the planning process will allow planners to coordinate information gathering and documentation, public notices, public hearings, and solicitation of public comment consistent with ANILCA within the context of BLM's overall planning process. Compliance with ANILCA will reduce the potential for appeals and challenges to proposed management actions.</p> <p>State selected lands should be managed consistent with DNR policies as outlined in the DNR fact sheet "Generally Allowed Uses on State Land" which is attached for your reference.</p> <p>The State appreciates the opportunity to offer initial scoping comments for the amendment to the Kobuk-Seward Peninsula Resource Management Plan to address the Squirrel River Special Recreation Management Area. We appreciate BLM's efforts to ensure close and consistent coordination throughout the planning process in order to address questions and facilitate resolution of issues as early as possible.</p> <p>Thank you for the opportunity to comment. Should you have any questions or concerns, please contact me at your earliest convenience.</p> <p>Sincerely,</p>  <p>Carol Fries State RMP Project Coordinator</p>
Northwest Arctic Borough	<p>Written</p> <p>NORTHWEST ARCTIC BOROUGH P.O. Box 1110 Kotzebue, Alaska 99752 (907) 442.2500 or (800) 478.1110 Fax: (907) 442.3740 or 2930</p> <p>December 14,2010</p> <p>Shelly Jacobson, Manager Central Yukon Field Office BLM - Fairbanks District Office 1150 University Ave. Fairbanks, AK 99709-3844</p> <p>Dear Ms Jacobson:</p> <p>The Northwest Arctic Borough is glad the Bureau of Land Management (BLM) is addressing the land uses and plans for the Squirrel River area. The Borough also appreciates your communication and willingness to work cooperatively with the borough and our residents on the Special Recreation Management Plan (SRMP). Please consider the below comments in the planning process.</p> <p><u>The Northwest Arctic Borough and Subsistence Relationship</u> As background, the Borough is a regional, home rule, municipal government chartered under the laws of Alaska. The Borough is located in rural northwest Alaska above the Arctic Circle, bordered by the Chukchi Sea. Our population of approximately 7,340 people live in 11 villages across an area of nearly 36,000 square miles, roughly the size of Indiana. There are 11 federally recognized Indian Tribes within the Borough whose members reside in each of the villages and surrounding residential camps. At a population of approximately 3,500, Kotzebue is the largest community in the Borough and the hub of the region's commercial activity.</p> <p>Over 82% of our residents are Inupiaq Eskimo and proudly thrive on the subsistence way of life as our ancestors have done for countless generations prior to</p>

	<p>Russian/European visits, US purchase of Alaska, Alaska statehood, and passage of ANCSA/ANICLA. The region's economy can best be described as "subsistence rich" and "cash poor" given our heavy reliance on wild resources to boost otherwise inadequate sources of cash income. The Borough has one of the highest poverty rates in the nation and extremely limited employment options. In 2004, 65% of the working-age population did not have full-time employment, and unemployment remains one of the biggest socio-economic problems facing Borough residents. Meanwhile, the cost of living in the rural arctic region has skyrocketed, particularly the costs of energy.</p> <p>In the northwest Arctic, the median real cost of home energy increased by over 130 percent from the year 2000 to 2008, causing state officials to declare a rural energy crisis. Gasoline prices remain high in remote Alaska despite the decrease in the rest of the United States. For example, since October 2008, Noatak residents have been paying over \$11.00 for a gallon of gasoline. The high energy prices are devastating in northwest Alaska where heating fuel and gas for ATVs and snowmachines to access hunting, fishing, and wild resource gathering areas are critical to provide food to families and maintain integrity of culture and tradition. With few opportunities to develop cash revenue in the region, subsistence opportunities are critical to economic security, cultural integrity and continued food security for Borough residents.</p> <p>In addition, Northwest Arctic communities are accessible only by air or water, and bulk items such as food and fuel oil are extremely expensive to transport. While Anchorage food costs are generally about 25% greater than most cities in the Western U.S., the rural communities of northwest Alaska have food costs more than twice that of Anchorage. High food prices mean that if communities were forced to replace subsistence harvests with store bought foods, the total economic replacement costs would range from 13% to 77% of the total per capita income for northwest Arctic communities.</p> <p><u>Comments and Recommendations Regarding the Squirrel River SRMP</u></p> <ul style="list-style-type: none"> • Recognize subsistence use of the Squirrel River area, as well as the whole Borough/Region <p>Subsistence has always been and continues to be one of the most successful and predominant cultural and economic activities in northwest Alaska - including the Squirrel River area. Subsistence is a way of life that rewardingly defines historic and modern-day existence, culture, and tradition for residents of northwest Alaska. It is frequently a matter of physical and spiritual survival. Continued subsistence opportunities, which occur all over the region, are at the heart of modern cultural survival for Alaska Natives, and subsistence practices are perhaps the strongest link between generations struggling to maintain their cultural identity. The BLM must recognize the importance of the Squirrel River area to support subsistence of the borough's residents and include this recognition in the SRMP.</p> <ul style="list-style-type: none"> • Ensure BLM managed lands meet the requirements for ANILCA's subsistence priority and only allow sport hunting when subsistence needs are being adequately met and there is a surplus of game <p>The Northwest Arctic Caribou Herd is at the center of subsistence for most Borough residents. To all of our rural residents in the region, caribou are a vital and irreplaceable subsistence resource. Every fall, Borough residents travel to traditional caribou hunting grounds to harvest caribou for coming winter months. These longstanding traditional hunting opportunities have been recently frustrated by irresponsible big game transporters flying-in outside trophy hunters and fueling an exponential growth of seasonal commercialized sport hunting in the region based upon caribou antler trophies.</p>
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	<p>The number of sport hunters flying out of Kotzebue, Fairbanks, Bettles and Galena to hunt caribou has exploded in recent years, and the growth in popularity has seen a corresponding burden on subsistence hunting and the health of the Western Arctic Caribou herd. The sport hunting boom has also caused displacement of subsistence hunters, increased waste of meat, and disruption of caribou migration patterns.</p> <p>The primary concern over the transporter-driven hunting boom has been the pattern of transporters dropping hundreds of clients off (during a short two month season) or establishing camps at key transportation corridors where caribou traditionally travel. Hunters are then picking-off the lead caribou-a practice that has been demonstrated to disrupt migration and disperse the herd-instead of waiting to shoot animals running further behind in the pack. The well-accepted practice by experienced residents is to let the first group of caribou travel through transportation corridors, rather than shooting members of the lead group, to preserve the herd's integrity and migration route.</p> <p>This pattern has been most frequently observed on and near BLM lands around the Aggie, Omar and Squirrel Rivers, where transporters drop-off hunters directly in the path of migrating fall caribou. This sport hunting practice diverts caribou away from traditional and accustomed subsistence harvest areas. Local subsistence hunters (often depending upon the caribou for basic food needs and cultural survival) are then forced to use more very expensive gas to travel further away from their villages and are frequently frustrated by the inability to harvest caribou at traditional or new sites in an efficient, economic manner.</p> <p>Additionally, local residents often report seeing large quantities of wasted meat left in the field, dumpsters, and at village airports. Residents often complain that trophy hunters leave with only the antlers and fail to responsibly (and legally) tend to caribou meat. When meat is offered to local residents, it's frequently inadequately cared for and often rancid. This wanton waste is troubling for residents who rely on caribou as a primary source of food to feed families and whole communities. It's also bewildering for many-wondering why someone would simply trash the very reason caribou are hunted.</p> <p>The Borough has responded to the increase in hunters by bolstering its search and rescue efforts. For example, during the fall of 2009, the borough search and rescue teams had to rescue three different parties of hunters, who transporters had dropped in unsuitable locations and were threatened by rising water, as well as the borough responding to a lost group of unprepared hunters. Search and rescue has been a necessary presence in the vast area within the borough's boundaries because big game transporters frequently drop-off hunters in inhospitable areas where they are ill-equipped to deal with the unpredictable arctic environment. The borough has established a search and rescue program in response to the influx of unequipped hunters and has scrambled to find ways to fund it.</p> <p>The struggle to preserve and promote subsistence caribou opportunities also raises issues of priority and entitlement. ANILCA guarantees a subsistence priority for rural residents of Alaska. Section 804 of ANILCA provides in part: [T]he taking on public lands of fish and wildlife for non-wasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes.²</p> <p>Courts have required that subsistence users be given a "meaningful preference" over competing users. ³</p> <p>From a legal standpoint, the region's and Borough's recent urgings for subsistence protection and preference for caribou frequently fall on deaf ears because of</p>
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	<p>the sheer numbers of caribou in the Western Arctic Herd. The herd is currently estimated to be near 300,000 animals. This is down from the estimated 490,000 in 2003. But rather than focus on numbers, the focus needs to be on meaningful access and opportunity to harvest caribou in traditional and accessible grounds.</p> <p>Local subsistence hunters are frustrated that they can no longer rely on traditional migration routes because herds are too frequently majorly diverted and driven far astray by irresponsible hunters camping in migration corridors and killing members of the lead pack. The problem is exacerbated by high-fuel costs that prevent local hunters from travelling far distances to reach the diverted caribou.</p> <p>The legislative history of section 804 of ANILCA demonstrates that Congress intended Section 804's protections to extend to particular wildlife populations: [I]f the continued viability of a particular population or the ability of rural subsistence-dependent residents to satisfy their subsistence needs would be threatened by a harvest by all such persons, the State rulemaking authority, in conjunction with the recommendations of the regional council representing the affected area, is required by this section to establish regulations which restrict the taking of such population to Alaska residents engaged in subsistence uses ... or, if necessary, only those local residents with the most customary and direct dependence on the population as the mainstay of livelihood and with the least access to alternative food supplies.⁴</p> <p>The legislative history of Section 804 also reflects that subsistence practices in particular areas are also protected:</p> <p>[T]he phrase "customary and traditional" is intended to place particular emphasis on the protection and continuation of the taking of fish, wildlife, and other renewable resources in areas of, and by persons (both Native and non-Native) resident in, areas of Alaska in which such uses have played a long established and important role in the economy and culture of the community and in which such uses incorporated beliefs and customs which have been handed down by word of mouth or example from generation to generation. <i>S</i></p> <p>It is these very areas of customary and traditional use that have been and continue to be at risk of being exploited by irresponsible hunting practices and unregulated transporters who drop-off hunters in reckless fashion, often on federally managed lands. Regardless of user preference, the bottom line is that no one wins when irresponsible transporting and hunting practices are followed. Indeed, professional sport hunting guides have also expressed outrage and concern over transporters' practices that have interrupted caribou migration and guides' traditional hunting areas.</p> <p>Local residents are highly-motivated to find solutions to the ongoing caribou user conflict because of the critical importance that caribou play in traditional diet and culture. Borough residents and officials have embarked on education campaigns to inform hunting service providers and incoming guests about responsible hunting practices and traditional values. The borough has also participated in a variety of discussions with agencies, boards, and users to develop long-term solutions.</p> <p>The Borough encourages the SRMP to include efforts to coordinate regulation and enforcement and "balancing" of sport and subsistence interests. Responsible management of federal lands according to ANILCA's subsistence preference needs to be at the center of public decision making on federal public lands.</p>
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	<ul style="list-style-type: none"> • Management plan implementation include a community recreation board <p>The Borough requests the BLM design and include a community recreation board to assist with the SRMP implementation. This will improve community relationships and aid in effective management of the BLM lands. We suggest the board include representatives from the Borough, NANA, Maniilaq and the villages of Kiana, Noorvik and Noatak.</p> <ul style="list-style-type: none"> • Permitting process for transporters, guides, tour operators, lodges and air taxis needs to be established for the Squirrel River area that includes community involvement <p>The Borough encourages the BLM to establish a permitting process for the Squirrel River area under the SRMP that includes community involvement - such as a permit review committee with representatives from the Borough, NANA, Maniilaq Association, and the villages of Kiana, Noorvik and Noatak. The permitting process needs to include commercial use of the area by transporters, guides, tour operators, lodges and air taxis. In addition, caps on the number of operators needs to be established, along with caps on the group sizes of clients and the number of clients available to use the area, with special attention given to the timeframe of August to October annually.</p> <p>In addition, the BLM permitting needs to have coordination with the Northwest Arctic Borough. The Borough exercises municipal zoning and permitting borough-wide including the Squirrel River area; however, the commercial transporter and guide operators have had little compliance with municipal ordinances and permitting requirements. The SRMP should recognize this issue and include measures to ensure that commercial operators are responsible and obtain all necessary permits and authorizations to operate businesses in the Squirrel River.</p> <ul style="list-style-type: none"> • Monitoring and enforcement plan for fall seasons in the plan <p>The monitoring and enforcement of the area is crucial during the fall season - August to October. The SRMP needs to have guidelines for monitoring with enforcement support during the high use period of the fall.</p> <ul style="list-style-type: none"> • Inupiaq cultural preservation in the SRMP <p>The Squirrel River area is the traditional lands of the Inupiaq people. The SRMP needs to recognize the cultural relationship of the Inupiaq people to the land, and the land to the Inupiaq people. This can be accomplished by supporting cultural preservation of the area including Inupiaq place names, archeological sites including traditional hunting and camping areas, knowledge of caribou migration routes, and Inupiaq language support.</p> <ul style="list-style-type: none"> • Workshops and training with neighboring communities to develop local outdoor tourism recreation businesses <p>The SRMP needs to support local/regional communities in starting businesses in outdoor tourism recreation. As stated in the background, the unemployment rate of the villages is excessive and there is a high need for creating job and business opportunities. The SRMP is a method to aiding area residents by including training and workshops to promote community-based businesses to serve the existing customers and tourism market of the Squirrel River. This will also provide a way for communities to become involved in the industry which is impacting subsistence. The new businesses can also provide new sustainable practices to the area and develop partnerships with existing operators.</p>
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		<p><u>Conclusion</u></p> <p>In closing, the Borough looks forward to continue our work together. If you have any questions, please feel free to contact me at 907-442-2500, extension 109, or via email at tokleasik@nwabor.org. Taikuu.</p> <p>Sincerely, Ukallaysaaq Tom Okleasik, Planning Director</p>
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