

APPENDIX H

Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement

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1 DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMUNITY ENGAGEMENT PROCESS

Community engagement is an integral part of the National Environmental Policy Act (NEPA) process and is required in the preparation and implementation of agencies’ NEPA procedures. Community engagement includes involvement by the public, Tribes, and Alaska Native Corporations (ANC). The Bureau of Land Management (BLM) published a notice of availability for the draft Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) withdrawals environmental impact statement (EIS) in the *Federal Register* on December 15, 2023 (88 *Federal Register* 86925). (The potential opening of the 17(d)(1) withdrawals described in the EIS is hereafter referred to as the *project*.) The notice of availability began the 60-day public comment period, which ended on February 14, 2024. The BLM held 19 public meetings and Alaska National Interest Lands Conservation Act (ANILCA) 810 subsistence hearings for the draft EIS in January and February 2024 (Table 1-1).

Table 1-1. Dates and Locations for Public Meetings and ANILCA 810 Subsistence Hearings

Meeting and Hearing Location	Date	Number of Attendees
Chickaloon	January 8, 2024	9
Gakona	January 9, 2024	15
Mentasta Lake	January 10, 2024	0
Delta Junction	January 11, 2024	1
Fairbanks Public	January 12, 2024	34
Cantwell Public	January 16, 2024	13
Anchorage Public	January 17, 2024	25
Virtual - Kenai Peninsula Focus	January 19, 2024	6
Virtual - Galena Focus	January 22, 2024	10
Virtual - Cordova Focus	January 23, 2024	17
Virtual - Haines Focus	January 25, 2024	14
Virtual - Statewide Focus	January 29, 2024	39
Kotzebue	January 31, 2024	26
Nome Public	February 1, 2024	21
Unalakleet	February 2, 2024	27
Aniak	February 6, 2024	23
King Salmon	February 7, 2024	14
Dillingham	February 8, 2024	13
Bethel	February 13, 2024	36

Pursuant to ANILCA 810(a)(1) and (2), the BLM conducted ANILCA 810 subsistence hearings in conjunction with every public meeting to gather comments regarding the findings presented in the ANILCA 810 evaluation (EIS Appendix C) resulting from the alternatives considered in the draft EIS. Court reporters were available at all hearing locations for attendees to record verbal testimony, and transcripts of each meeting were produced.

Notification of the publication of the draft EIS at the beginning of the comment period included direct emails of the news release to the project interested party contact list.

Details concerning dates, times, and locations of the public meetings and hearings were announced through local news media, newspapers, social media, email, and the BLM project website. Comments on the draft EIS and ANILCA 810 evaluation findings were received by email, U.S. Postal Service, through the BLM project website, and at public meetings and ANILCA 810 hearings and Tribal consultation meetings held during the public comment period.

The transcripts and the presentation slides from the meetings are available on the BLM project website: <https://eplanning.blm.gov/eplanning-ui/project/2018002/510>. A summary of the project’s community engagement efforts during scoping is in the scoping report, which is also available on the BLM project website: <https://eplanning.blm.gov/eplanning-ui/project/2018002/570>. Public outreach during preparation of the EIS is summarized in final EIS Section 1.6, Community Engagement.

2 DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENT OVERVIEW

During the 19 public meetings and hearings, 93 people provided oral comments. The BLM received a total of 14,835 submittals during the public comment period comprising unique letters, form letters, form plus letters, and duplicate letters (Table 2-1).¹ Of the unique letters, 16 were petition-style where multiple individuals signed on the content of the letter. As a result, a total of 14,444 individuals submitted written comments during the comment period. The BLM reviewed and responded to public comments via revisions in the final EIS.

Table 2-1. Submittals by Type

Submittal Type	Number of Submittals	Percentage of Total Submittals
Unique letters	1,081	7%
Form letters	11,919	81%
Form plus letters	1,375	9%
Duplicate letters	460	3%
Total	14,835	100%

2.1 Respondent Affiliations

In all, more than 350 submittals came from commenters who indicated they represented a Tribe, ANC, or nongovernmental Tribal group, government agency or government official, business, or organization. All other submittals came from unaffiliated individuals. Individuals who provided an affiliation, such as their business title or employer information in their letter or testimony, but did not state that they were an official representative were counted as unaffiliated individuals.

The Tribes, ANCs, nongovernmental Tribal groups, government agencies, government officials, businesses, and organizations that submitted written comments are listed in Table 2-2. (There are fewer

¹ A *submittal* is defined as a single email, letter, webform submittal, or speaker in written transcripts.

Unique letters are submittals, either written or oral, with unique content.

Form copy letters are standardized letters that contain identical or nearly identical text.

Form plus letters are form letters that slightly deviate from the standard by containing similar text that is not identical.

Form plus letters are not counted as individual unique comments unless they contain additional substantive text.

Duplicate letters are duplicates of a unique letter.

than 350 affiliations listed in Table 2-2 because some organizations provided multiple submissions. For example, one organization provided more than 200 submissions.)

Table 2-2. Respondent Affiliations

Respondent Type and Title	
<i>Businesses and Organizations</i>	
Alaska Chapter of The Wildlife Society	National Audubon Society
Alaska Community Action on Toxics	National Parks Conservation Association
Alaska Food Policy Council	National Wildlife Federation
Alaska Homestead Adventures LLC	Native American Rights Fund
Alaska Miners Association	Maryland Ornithological Society
Alaska Shorebird Group	Norton Bay Watershed Council
Alaska Wilderness League	Outdoor Alliance
American Hunters	Outdoor Industry Association
Audubon Alaska	Oasis Earth
Auftrieb	Permafrost Pathways at Woodwell Climate Research Center
Backcountry Hunters & Anglers	Pew Charitable Trusts
Bristol Bay Fishermen's Association	Prince William Sound Audubon Society
Bristol Bay Subsistence Regional Advisory Council	Protect Our Winters
Center for Biological Diversity	Rivers Without Borders
Civilized Humanity	SalmonState
Commercial Fishermen for Bristol Bay	Seward Peninsula Subsistence Regional Advisory Council
Conservation Alliance	Shasta Environmental Alliance
Cook Inletkeeper	Sierra Club
Defenders of Wildlife	Snowmobilers
Earth Justice	Susitna River Coalition
Friends of the Earth	Takshanuk Watershed Council
Center for Biological Diversity	Theodore Roosevelt Conservation Partnership
Curry Ridge Riders Inc. of Trapper Creek	Tochak Historical Society
Defenders of Wildlife	Trustees for Alaska
Defenders of Wildlife Based On Dena'ina Lands	Western Arctic Caribou Herd Working Group
Don't Cage Our Oceans	Western Colorado University Students
Driftwood Wilderness Lodge	Western Interior Subsistence Regional Advisory Council
Earthworks	Wild Salmon Center
Friends of the Earth US	Wildlife Forever
Iditarod Historic Trail Alliance	World Wildlife Fund
Kachemak Bay Conservation Society	Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Kobuk Valley National Park Subsistence Resource Commission	

Respondent Type and Title	
Government Agencies and Government Officials	
City of Delta Junction	Northwest Arctic Borough
Federal Aviation Administration	State of Alaska
National Park Service	U.S. Environmental Protection Agency Region 10
U.S. Fish and Wildlife Service	Senator Dan Sullivan, U.S. Congress
Tribes, ANCs, and Nongovernmental Tribal Groups	
ANCSA Regional Association	King Island Native Community
Ahtna Intertribal Resource Commission	Koyukuk Village Council
Ahtna, Inc.	Kuskokwim Corporation
Anvik Tribal Council	Kwethluk, Incorporated
Arctic Slope Regional Corporation	Maniilaq Association
Association of Village Council Presidents	Mother Kuskokwim Tribal Coalition
Bering Sea Elders Group	NANA Regional Corporation
Bering Sea Interior Tribal Commission	Native Movement
Bristol Bay Native Corporation	Native Village of Brevig Mission Traditional Council
Calista Corporation	Native Village of Dot Lake
Chevak Traditional Council	Native Village of Eyak
Chickaloon Moose Creek Native Association, Inc.	Native Village of Kotzebue
Chickaloon Native Village	Native Village of Koyuk
Chilkat Indian Village	Native Village of Shaktoolik Tribal Council
Chinik Eskimo Community	Native Village of St. Michael Tribal Council
Chuathbaluk Traditional Council	Native Village of Tazlina
Cook Inlet Region, Inc.	Native Village of Teller Traditional Council
Deloy Ges Village Corporation	Native Village of Tununak
Dot Lake Village Council	Native Village of Unalakleet
Doyon, Limited	Nulato Tribal Council
Grayling IRA Tribal Council	Orutsararmuit Traditional Native Council
Holy Cross Tribe	Shaanax Hit Taant'a Kwáan Taan'taquan
Igiugig Native Corporation	Stebbins Native Corporation
Igiugig Village Council	Tanana Chiefs Conference
Iqfijouaq Corporation	United Tribes of Bristol Bay
Kaltag Tribal Council	Yakutat Tlingit Tribe
Kawerak, Inc.	Yukon River Intertribal Watershed Council

2.2 Comment Categories

Within each submittal, individual comments (i.e., stand-alone comments that relate to a single issue, idea, or conclusion) were identified and grouped into one or more of the categories listed in Table 2-3. Comment categories were either defined by individual resources that may be affected by the project, individual elements of the project, or specific phases and aspects of the draft EIS or NEPA process (see

Table 2-3). Categories are intended to describe the main topic or resource that is discussed in the comment regardless of whether the comment expresses opposition or support for the project. Any comments identified in form letters or duplicate letters were categorized only once and counted as a single comment no matter how many letters with that same comment were submitted.

The BLM reviewed and responded to comments on the draft EIS via revisions in the final EIS and in the comment response tables in Attachment 1 (Public Comments and Bureau of Land Management Responses). To date, 740 total individual substantive (further defined below) comments were identified from the various submittals and were categorized (Table 2-3). Almost half of the comments (49%) fell into the following four categories: subsistence, terrestrial mammals, fish and aquatic species, and cumulative impacts.

Table 2-3. Substantive Comments Received by Comment Category

Comment Category	Number of Comments Received	Percentage of Total Comments
Subsistence	164	22%
Terrestrial mammals	88	12%
Fish and aquatic species	60	8%
Cumulative impacts	54	7%
Reasonably foreseeable development	30	4%
Cultural resources	29	4%
Economics	25	3%
Compliance with other laws	25	3%
Alternatives	24	3%
Analysis methods	24	3%
General NEPA compliance/process	22	3%
Social systems	20	3%
17(d)(1) withdrawals and land status	18	2%
Public and stakeholder involvement	17	2%
Birds and special status bird species	17	2%
Climate	15	2%
Water resources	15	2%
Recreation and travel management	12	2%
Tribal and Government-to-government consultation	10	1%
ANILCA 810 analysis	10	1%
Request for comment period extension	9	1%
Vegetation, wetlands, and special status plants	8	1%
Land selection	7	1%
Soils and permafrost	7	1%
Purpose and need	7	1%
Minerals	6	1%
Environmental justice	5	1%
Realty and lands	4	< 1%

Comment Category	Number of Comments Received	Percentage of Total Comments
14(h)(1) lands	3	< 1%
Section 106 consultation	2	< 1%
Agency consultation	1	< 1%
Paleontological resources	1	< 1%
Scope	1	< 1%
Total	740	100%

2.3 Criteria for Substantive Comments

The BLM considered comments within every submittal and determined if comments were substantive or non-substantive. In performing this analysis, the BLM relied on Section 6.9.2 (Comments) in the BLM NEPA Handbook H-1790-1 (BLM 2008) to determine what constituted a substantive comment. All comments were reviewed and considered, and all substantive comments are responded to in this report.

Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS
- Question, with reasonable basis, the accuracy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EIS
- Cause changes or revisions in one or more of the alternatives

Additionally, the BLM NEPA Handbook H-1790-1 (BLM 2008) identifies the following types of substantive comments:

- Comments on the adequacy of the analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are considered substantive; they may or may not lead to changes in the final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the BLM Authorized Officer (AO) responsible for preparing the EIS does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments that identify new impacts, alternatives, or mitigation measures: Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that the draft did not address are considered substantive. This type of comment requires the BLM AO to determine if it warrants further consideration; if the BLM AO must determine if the new impacts, new alternatives, or new mitigation measures should be analyzed in the final EIS, in a supplement to the draft EIS, or in a completely revised and recirculated draft EIS.
- Disagreements with significance determinations: Comments that directly or indirectly question, with a reasonable basis, determinations on the severity of impacts are considered substantive. A reevaluation of these determinations may be warranted and may lead to changes in the final EIS. If, after reevaluation, the BLM AO does not think that a change is warranted, the BLM's response should provide the rationale for that conclusion.

Comments that are not considered substantive include the following:

- Comments in favor of or against the Proposed Action or alternatives without reasoning that meets the criteria listed above, such as “we disagree with Alternative B and believe the BLM should select Alternative A.”
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above, such as “more grazing should be permitted.”
- Comments that do not pertain to the project area or the project, such as “the government should eliminate all dams” when the project is about a grazing permit.
- Comments that take the form of vague, open-ended questions

In response to substantive comments, the BLM could do the following:

- Modify alternatives, including the Proposed Action
- Develop and evaluate alternatives not previously given detailed consideration by the agency
- Supplement, improve, or modify its analyses
- Make factual corrections
- Explain why the comments do not warrant further agency response, citing appropriate sources or authorities

Within each submittal, there could be substantive comments and non-substantive comments. Comments that merely express an opinion for or against the project were not identified as requiring a response because they meet the BLM NEPA Handbook H-1790-1 (BLM 2008) definition for a non-substantive comment. Many comments received during the comment analysis process expressed personal opinions or preferences, did not provide relevance to the adequacy or accuracy of the draft EIS, or represented commentary on management actions that are outside the scope of the EIS. These comments did not provide specific information to assist the BLM in making a change to the existing action alternatives, did not suggest new alternatives, and did not take issue with methods used in the draft EIS; given this, the BLM did not provide a response for these comments in this document.

3 COMMENT THEMES

Of the substantive comments received, common themes were identified and are summarized by comment category in Table 3-1. Table 3-1 is not an exhaustive list of all comments; please see Attachment 1 for all substantive comments.

Table 3-1. Substantive Comment Themes

Comment Category	General Theme of Comments
14(h)(1) lands	Commenters requested that 14(h)(1) sites should be conveyed before 17(d)(1) withdrawals are revoked and that any rejected 14(h)(1) sites be re-opened for selection.
17(d)(1) withdrawals and land status	Commenters expressed the desire to complete ANC selections and conveyances and Alaska Native Vietnam-era veteran allotment selections prior to the Secretary revoking any 17(d)(1) withdrawals. Commenters questioned the change in policy from the BLM's 2006 Report to Congress (BLM 2006) required by Section 207 of the Alaska Land Transfer Acceleration Act.

Comment Category	General Theme of Comments
Agency consultation	Commenter stated that the BLM did not obtain consent on revoking withdrawals pursuant to Federal Land Policy and Management Act Section 204(i).
Alternatives	<p>Commenters expressed the desire for land under various 17(d)(1) withdrawals to be retained in BLM management as part of the evaluated alternatives for social, environmental, economic, and subsistence reasons.</p> <p>Commenters suggested changes to the evaluated alternatives in the draft EIS.</p>
Analysis methods	<p>Commenters questioned the assumptions and adequacy of the analysis methods used in the draft EIS and reasonably foreseeable development (RFD) scenario to determine impacts to various resources.</p> <p>Commenters requested the incorporation of indigenous knowledge into the EIS.</p>
ANILCA 810 analysis	<p>Commenters expressed concern about the identified impacts to subsistence and questioned whether they were necessary. Others expressed concern that the BLM is not using the minimum amount of public lands for this action and questioned whether reasonable steps had been taken to minimize impacts. Some commenters noted inconsistencies in the analysis between the text and the tables.</p> <p>Some commenters questioned the analysis methods used to determine impacts and adequacy of the cumulative impacts assessment.</p>
Birds and special status bird species	<p>Commenters expressed concern about impacts to bird migrating, nesting, and foraging habitat due to predicted development on revoked 17(d)(1) withdrawals.</p> <p>Commenters requested additional analysis of impacts to specific bird species and questioned the adequacy of the analysis on threatened and endangered bird species.</p>
Climate	<p>Commenters requested lands be retained in BLM management to limit emissions from development that could exacerbate climate change.</p> <p>Commenters requested additional analyses for effects to climate change, including additional analyses on the long-term and cumulative impacts.</p>
Compliance with other laws	Commenters questioned compliance with the original intent of ANCSA 17(d)(1) as well as Federal Land Policy and Management Act, the Alaska Statehood Act, ANILCA, planning areas' resource management plans, State and Federal mining laws, State laws, land use codes, and climate initiatives.
Cultural resources	<p>Commenters expressed concern regarding the transfer of cultural resources out of Federal ownership.</p> <p>Commenters believed the analysis was not thorough and relied on incomplete datasets given the large scope of lands involved. Commenters were concerned about the lack of surveys prior to transferring lands out of Federal ownership.</p> <p>Commenters believed there was a lack of Tribal input and traditional knowledge in the document.</p>
Cumulative impacts	<p>Commenters expressed concerned about the cumulative impacts that revoking the withdrawals could have. Commenters requested additional analysis of cumulative impacts on the evaluated resources, including local impacts like habitat fragmentation and spills from potential mining and development as well as global impacts to climate change.</p> <p>Commenters believed the cumulative impacts analyses were too vague and non-specific.</p>
Economics	<p>Commenters requested an expanded economic analysis to evaluate effects to tourism and the tourism industry, fisheries, recreation, and guiding services. Commenters requested clarification on non-use and passive use.</p> <p>Commenters questioned the statement that development could bring economic benefit to surrounding communities.</p>
Environmental justice	<p>Commenters requested further clarification on impacts to environmental justice communities.</p> <p>Commenters requested the development of mitigation measures to offset impacts to environmental justice communities.</p> <p>Some commenters also requested further discussion of the benefits of development to environmental justice communities.</p>
Fish and aquatic species	<p>Commenters requested the inclusion of more specific data and analysis for specific rivers, watersheds, and fish populations.</p> <p>Commenters also requested additional information be added regarding the impacts of development, particularly roads, on habitat fragmentation.</p>

Comment Category	General Theme of Comments
General NEPA compliance/process	<p>Commenters expressed concern over estimating impacts over the entire 28 million acres instead of breaking it down into planning areas in separate EISs.</p> <p>Commenters requested consultation with Tribes as required by law for an EIS.</p> <p>Commenters questioned the history that has led to the development of this EIS, and past declarations by the BLM on their intention to lift the withdrawals.</p>
Tribal and government-to-government consultation	<p>Commenters expressed concern about proper notification of the preparation and publication of the EIS and the ability to consult with the BLM.</p> <p>Commenters requested that Tribal engagement follow all consultation requirements.</p> <p>Commenters requested co-management with the BLM and questioned the process for classification of lands.</p>
Land selection	<p>Commenters requested that the State complete their selections and that ANCs receive their entitlements before any lands are conveyed.</p>
Minerals	<p>Commenters requested that all Federal lands should be closed to mineral entry.</p> <p>Commenters questioned the use of mineral availability in the draft EIS as an indicator of impacts.</p> <p>Commenters noted that many mines have contamination associated with them that are not cleaned up.</p>
Paleontological resources	<p>Commenter questioned the use of the BLM's Potential Fossil Yield Classification System.</p>
Public and stakeholder involvement	<p>Commenters expressed frustration with the public involvement process for the public comments and ANILCA 810 hearings, including the time they had to comment and notification of the project's existence for comment. They questioned the accessibility of information and communication about the project.</p>
Purpose and need	<p>Commenters questioned the purpose and need of the EIS and referenced a stated purpose of the ANCSA 17(d)(1) withdrawals.</p>
Realty and lands	<p>Commenters expressed concern about continuing public access availability on lands that currently have easements. Commenters requested the decisions be compliant with existing local and State management plans.</p>
Reasonably foreseeable development	<p>Commenters questioned the assumptions and adequacy of the analysis methods used in the RFD Scenario to determine impacts to various resources, particularly the areas identified as more likely to be developed and the focused analysis area. Commenters requested additional citations and clarifications on how the RFD was developed and where data came from.</p>
Recreation and travel management	<p>Commenters requested the importance and value of recreation on human health and the economy be added to the EIS.</p>
Request for comment period extension	<p>Commenters requested extensions to the public comment period.</p>
Scope	<p>One commenter asked that the EIS be completed through a systematic approach.</p>
Section 106 consultation	<p>Commenters expressed concern about the loss of Section 106 protections on withdrawals conveyed to the State, which would change how cultural resources are managed.</p> <p>Commenters also said the Section 106 process must be completed for the EIS and would like to take part in the process.</p>
Social systems	<p>Commenters expressed concern over effects to mental health, spiritual and ceremonial connection to the land, food access and security, nutritional value of food, and subsistence.</p> <p>Commenters questioned the assertion that revocation of withdrawals could have beneficial economic or social effects.</p> <p>Commenters expressed concern over the construction of work camps that could bring violence and alcohol to local communities, especially for indigenous women.</p>
Soils and permafrost	<p>Commenters requested additional analysis on the impacts to permafrost from development and climate change.</p>

Comment Category	General Theme of Comments
Subsistence	<p>Commenters expressed concern regarding a loss of Federal subsistence priority and the potential impacts of development on subsistence resource abundance and availability, particularly related to caribou, fish, and waterfowl.</p> <p>Commenters believed the study community selection criteria did not adequately capture all potentially affected communities. They also stated that the draft EIS did not address potential impacts to nonrural users.</p> <p>Commenters expressed concern that the analysis did not adequately capture indirect effects to communities outside of the withdrawal area, nor the broader social, cultural, and psychological effects.</p> <p>Commenters believe the RFD underestimated potential development impacts.</p> <p>Commenters also stated that there was a lack of indigenous knowledge in the document.</p>
Terrestrial mammals	<p>Commenters requested more information be added to the EIS regarding habitat fragmentation and how revocations of withdrawals could impact wildlife movements as a result of fragmentation of the landscape.</p> <p>Commenters expressed concerns for potential impacts to caribou, especially for the Western Arctic and Nelchina herds that have undergone large population declines in recent years.</p> <p>There were also requests to include more information on specific species, including Dall sheep, wolverine, and bats.</p>
Vegetation, wetlands, and special status plants	<p>Commenters expressed concern that the project would result in impacts to wetlands and wetland vegetation and requested further analysis on the role wetlands play as part of the landscape.</p>
Water resources	<p>Commenters expressed concern that mining and industrial development would result in detrimental impacts on water quality, fish populations, and general ecological health.</p> <p>Commenters requested more detailed analysis of potential impacts to water resources from development that may occur as a result of revoking 17(d)(1) withdrawals.</p>

The BLM also received non-substantive comments. Most of these non-substantive were in general opposition to the project. Other non-substantive comment themes are summarized in Table 3-2 and listed in Attachment 1, Out of Scope comments.

Table 3-2. Non-Substantive Comment Themes

Theme	Summary
A.	Commenters noted that the EIS would not be compliant with the Biden Administration's climate initiatives and executive orders. Commenters also questioned how the actions of the project would comply with the national strategy for the Arctic region.
B.	Commenters noted deficiencies in the prior issuance of public land orders. Alternatively, other commenters expressed that there were not any errors with this original analysis.
C.	Commenters requested that ANCs be able to re-prioritize their selections.
D.	Commenters requested a more robust subsistence analysis in the EIS. One commenter noted that the action alternatives in the EIS contradict the 2022 Alaska Food Security Action Plan, which contains an objective regarding food justice and improving Tribal collaboration and engagement regarding subsistence uses and regulations.
E.	Commenters requested that the BLM consider options for co-management or co-stewardship with impacted Alaska Native communities. Another commenter noted that if withdrawals are revoked, they request a thorough cultural resource survey in conjunction with the tribes that are associated.
F.	Commenters requested wilderness designation, critical habitat designation, or other special designation status for specified locations. Commenters noted that Tribes nominated areas of critical environmental concern in the past, and for those areas of critical environmental concern that were rejected, withdrawals are the only protections on the land.
G.	Commenters noted that the final EIS should consider mitigation policy and guidance to address development related impacts. Commenters noted that regulators must require that adequate bonding be posted for mining cleanup and permitting review by independent experts.
H.	Commenter requested a deadline to finalize the State selection process in order to conclude the conveyance process and noted that withdrawals have outlived their intended purpose, and that continued retention of the withdrawals frustrates the State's ability to fulfill remaining land entitlement.

4 LITERATURE CITED

Bureau of Land Management (BLM). 2006. *Sec. 207 Alaska Land Transfer Acceleration Act. A Review of D-1 Withdrawals*. Report to Congress. June 2006. BLM/AK/AD-06/007+2355+932. Alaska State Office, Anchorage.

———. 2008. *BLM National Environmental Policy Act Handbook*. BLM Handbook H-1790-1. Washington, D.C.: U.S. Department of the Interior, Bureau of Land Management.

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ATTACHMENT 1

Public Comments and Bureau of Land Management Responses

The tables below are organized by comment code and by letter and comment number. The letter number represents the submittal number, and comment number represents the substantive comment identified within the submittal. Some responses refer the reader to a response made for a similar substantive comment submittal. Comment and letter numbers are presented sequentially in the tables; any numbers that are missing from the sequence (e.g., where numbers skip from 1 to 3) are a symptom of non-substantive or duplicative comments being removed during the categorization process.

Unless provided at the end of a response to comment, literature cited in the responses to comments can be found in EIS Chapter 4. Abbreviations used in the responses are listed and defined in the EIS Contents section.

Section 106 Consultation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13870-3	Megan Condon	Bering Sea-Interior Tribal Commission	All three action alternatives that the Bureau analyzed in the Draft EIS have the potential to impact cultural resources through the loss of federal regulatory protections as well as an increase in lands open to development. Any conveyance of land to the State of Alaska will remove substantive regulatory protections for cultural resources and impact Tribes involvement in the processes designed to protect cultural resources. For example, the National Historic Preservation Act (NHPA) Section 106 process will no longer apply on lands conveyed to the State, unless the proposed activity includes federal funding or a federal permit. The Section 106 process requires federal agencies to consult with any Tribe that may attach traditional religious and cultural significance to a historic property that may be affected by a proposed project or activity. In contrast, the Alaska Historic Preservation Act does not provide any formal means for Tribes to consult with the State on the identification and protection of Tribal cultural resources. Therefore, any transfer of federal land to the State would fundamentally change the way in which cultural resources are managed by diminishing the protections available for cultural resources and decreasing Tribes ability to be involved in decisions potentially impacting their cultural resources. Additionally, the Bureau must complete the NHPA Section 106 process as part of the agency's ongoing review of d-1 withdrawals. The Bureau did not undertake the Section 106 process during its land use planning processes and has since identified the failure to follow Section 106 as one of the legal defects in the decision-making that led to public land orders lifting d-1 withdrawals. The purpose of the Section 106 process is to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. The NHPA defines historic property as any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the National Register and explicitly includes, [p]roperty of traditional religious and cultural importance to an Indian tribe. As the Bureau moves forward with the Section 106 process and determinations of National Register eligibility, the agency must identify historic properties and apply the eligibility criteria in consultation with Tribes. Any determination of whether a historic property is of religious or cultural importance to a Tribe should be made by a representative designated by the Tribe. The Advisory Council on Historic Preservations (ACHP) regulations implementing the Section 106 process directs agencies to initiate the process early in the undertakings planning, so that a broad range of alternatives may be considered. The ACHP further directs agencies to coordinate Section 106 compliance with the NEPA process to ensure agencies address historic preservation issues in the preparation of an EIS or EA, including identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects. In the Draft EIS, the Bureau indicated that it expects to send invitations to the first consulting party meeting in winter 2023/2024. The Bureau did not send these invitations until January 26, 2024, less than three weeks before the close of the public comment period. Waiting to convene the first consulting parties meeting until after releasing the Draft EIS severely limits the Bureaus opportunities to incorporate the information from Section 106 consultations in the agency's EIS process, and in turn undermines the agency's ability to avoid or minimize adverse impacts to cultural resources.	The BLM is writing a PA to comply with the Section 106 of the NHPA for the project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the decision area, and takes their comments into account. Section 106 consultation invitation letters were first sent to Tribes, ANCs, and municipalities on 8/22/2022 and 11/16/2022. The BLM notified the Alaska State Historic Preservation Office and the Advisory Council on Historic Preservation (ACHP) of the project on January 11, 2023, and invited them to review and identify issues that should be addressed in the EIS. Tribes and ANCs, along with other consulting parties, that indicated their interest in participating in the Section 106 process, either in response to the above letters or via other consultation or public scoping, were sent a letter along with a template PA, on 1/25/2024, and invited to a virtual Section 106 consulting party meeting on 2/15/2024. Information on how to participate in the Section 106 process has also been posted on the ePlanning website for the project.	N
14630-2	Emily Johnson	National Park Service	We also recognize that NPS declined the opportunity to be a cooperating agency; however, as a result of the breadth of this analysis and the potential for impacts on a near statewide level, we formally request... 2) to sit down with BLM staff to discuss our concerns with the DEIS; 3) to be a consulting party for Section 106 National Historic Preservation Act review for any action taken that would potentially affect National Historic Landmarks; and 4) to be a consulting party during the development of any programmatic agreement (PA) with the State's Historic Preservation Office (SHPO).	The NPS was invited to participate under Section 106 in April 2024. Section 106 consultation invitation letters were first sent to Tribes and ANCs on 8/22/2022 and 11/16/2022. Tribes and ANCs, along with other consulting parties, that indicated their interest in participating in the Section 106 process, either in response to the above letters or via other consultation or public scoping, were sent a letter along with a template PA, on 1/25/2024, and invited to a virtual Section 106 consulting party meeting on 2/15/2024. Information on how to participate in the Section 106 process has also been posted on the ePlanning website for the project.	N

14(h)(1) lands					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13790-4	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	Additionally, there are ANCSA 14(h)(1) sites that have yet to be conveyed to their respective ANCs. Removal of the 17(d)(1) withdrawals should not be considered until these 14(h)(1) sites are properly conveyed. The only understanding we gained from the EIS is that pending sites would remain protected and rejected sites would not. One major concern is that rejected sites still have cultural significance and could potentially be reassessed if another 14(h)(1) application is submitted. If the BLM lands containing potential 14(h)(1) sites are conveyed to the State, there is little faith that the State will protect those sites resource extraction, or other related activities. As an example: the failure of the State to protect a cemetery from desecration and vandalism at Eskilida Creek, or the historic Gulkana Village (which took well over 40 years to get back).	As described in EIS Section 3.4.2.2.2, Alternative C (Partial Revocation) and Alternative D (2021 Proposed Action), if the Secretary accepts the revocations under Alternatives C and D, the rejected 14(h)(1) lands could be conveyed to the State if the lands are currently top filed. The land may also be conveyed under other programs without further NHPA consultation in which the BLM does not have discretion like the Dingell Act allotments. However, the BLM will consider the historic and cultural values of the land for any discretionary action under Section 106 of NHPA for any action it is asked to permit. If a 14(h)(1) site is certified ineligible by the Bureau of Indian Affairs, and the BLM takes subsequent action and rejects the selection, there are no provisions in place under ANCSA or the Alaska Statehood Act that would allow the BLM to exclude a cultural resource that may be associated with the rejected 14(h)(1) site from conveyance to the State of Alaska.	N
14167-13	Olivia Karns	Tanana Chiefs Conference	Analysis of cultural resources concludes with a review of ANCSA 14(h)(1) historical places and cemetery sites. This class of cultural resources is unique in that they are important cultural sites identified by ANCSA regional corporations for their entitlement to ancestral places. Cultural sites in the ANCSA inventory are diverse and include abandoned large villages, cemeteries, sacred sites, traditional cultural places, significant use areas and other associated cultural resources. Some of the ANCSA 14(h)(1) site applications were denied during a preselection phase due to ANCSA (d)(1) land conflicts. Revoking the ANCSA (d)(1) lands PLOs should open eligibility determinations for ANCSA regional corporations to select those sites prior to any further consideration of land disposals that include ANCSA 14(h)(1) sites. Among the five planning areas there are 603 pending sites and 493 rejected. Previously filed ANCSA 14(h)(1) applications that were rejected due to conflicts with ANCSA (d)(1) withdrawals should be administratively reopened if the ANCSA (d)(1) lands PLOs are revoked. Further, the decision on the ANCSA (d)(1) lands will inform management practices in other resource management planning areas, such as the Central Yukon resource management area, and pose adverse effects to a larger pool of ANCSA 14(h)(1) sites. ANCSA regional corporations need to be consulted on this important subject.	In addition to the response to comment 13790-4, a 17(d)(1) withdrawal, by itself, does not prevent the BLM from transferring lands to ANCs under Section 14(h)(1). Secretarial Order No. 3220 provided opportunity for possible reinstatement of 196 Section 14(h)(1) selections previously rejected due to a 17(d)(2) withdrawal and closed of record. The BLM continues to reinstate those selections upon adjudication of meeting requirements pursuant to the Order and Section 14(h)(1) provisions under ANCSA. See response to comment 13870-3.	N
14730-3	Kathryn Martin	Ahtna, Inc.	With regard to our historic and cemetery sites selected under ANCSA section 14(h)1, we are currently in a no-win position for those sites in the "D1" withdrawal areas. Fifty-two of Ahtna Inc's otherwise-valid 14(h)1 claims are being rejected because they are located on land currently withdrawn under 17 (d)(1). We are told even if or when the withdrawals are lifted, those fifty-two claims will still be rejected due to the fact that, since the land was under withdrawal, it was "encumbered" at the time of selection as a 14(h)1 parcel, and thus technically unavailable. Instead, State of Alaska top filed claims would slide into place and the State would receive title to (and management authority over) our 14(h)1 sites. The best way to address this situation is to implement Alternative A, with a partial revocation on valid 14(h)1 selections that can then slide into place and receive priority so they can then be conveyed to a Native corporation. This must be a priority. Cultural sites in the withdrawal areas that are not 14(h)1 sites also need the continued protection of federal cultural resource laws offered by Alternative A since the push to open State lands to recreation, mining/mineral interests, trails and other resource use can reasonably be expected to continue, with devastating adverse impacts to cultural sites.	The selection period for parcels of land under Section 14(h)(1) has expired. However, Secretarial Order 3220 allowed 196 rejected selections to be reinstated upon the corporation's request for selections in the rare situation where the lands selected were within lands withdrawn pursuant to both Section 17(d)(1) and 17(d)(2) of ANCSA, such land was recommended to Congress for inclusion in a conservation system unit, Congress did not include the land within a conservation system unit, and the land could at the time of the Secretarial Order be conveyed to a Native Corporation. The BLM has received requests to reinstate 188 of the 196 recognized selections that meet the parameters of the Secretarial Order. In such situations, a reinstated 14(h)(1) selection would have priority over a State top filing. A State top filing would not become effective upon revocation on the selected lands due to the segregation of the lands caused by the 14(h)(1) selection. If you have any questions, please contact BLM realty staff. See response to comment 14167-13.	N

ANILCA 810 Evaluation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13368-5	Lisa Ellanna	Kawerak, Inc.	Through the EIS process, the Bureau has concluded that all three action alternatives and the cumulative case may result in a significant restriction to subsistence uses. The Bureau's significant restriction findings require that the Bureau must determine whether "the proposed restriction of subsistence uses is necessary, that the minimal amount of 'public lands' are involved, and that reasonable steps have been taken to minimize the adverse impact on subsistence uses." These findings limit the Bureau's decision-making and create an affirmative duty for the Bureau to minimize impacts to subsistence uses. Maintaining all d-1 withdrawals under Alternative A, fulfills the Bureau's ANILCA 810 obligations, and is most consistent with ANILCA Title VIII's underlying purpose to "provide the opportunity for rural residents engaged in a subsistence way of life to do so."	EIS Appendix C, ANILCA 810 Evaluation, details the BLM's findings, which will inform the decision-making. Under Section 810, the Secretary may allow the action if reasonable steps are taken to minimize the impact.	N

ANILCA 810 Evaluation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13628-21	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The ANILCA 810 Evaluation in Appendix C contains confusing and inconsistent references to the number of communities affected by revocation. The text indicates that there are 223 rural communities within 50 miles of D1 withdrawals and 139 focused analysis area communities (App. C, p.3). However, Figure C-1 depicts 144 Subsistence Focused Analysis Area communities along with 61 Other Subsistence Analysis communities. It is unclear how these numbers should be reconciled. Similarly, the evaluation states that 56 of the focused analysis communities have subsistence use areas overlapping lands more likely to be developed under Alternative B (App. C, p.9). However, later it is indicated that 55 communities overlap lands more likely to be developed under Alternative B (App. C, p.20,24), as well as 61 communities (App. C, p.22). It is unclear which is the correct number. These should be corrected as clarity and consistency in the numbers presented are essential to enable reasonable evaluation of potential impacts by the public.	EIS Appendix C, ANILCA 810 Evaluation, was edited to reflect clear and accurate numbers.	Y
13870-6	Megan Condon	Bering Sea-Interior Tribal Commission	<p>In addition to addressing the legal defects identified in the decision-making process to lift d-1 withdrawals, the Bureau has also identified compliance with Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) as one of the reasons for undertaking this EIS process. ANILCA Section 810 requires agencies to consider the effects of federal land use decisions on subsistence uses and take steps to minimize adverse impacts. In enacting ANILCA, Congress found that the continuation of the opportunity for subsistence uses . . . is essential to Native physical, economic, traditional, and cultural existence. To ensure the continuation of those subsistence uses and subsistence-based ways of life, ANILCA mandates that federal actions which would significantly restrict subsistence uses can only be undertaken if they are necessary and if the adverse effects are minimized. ANILCA Section 810 creates a process to enable rural residents who have personal knowledge of local conditions and requirements to have a meaningful role in the management of fish and wildlife and of subsistence uses on public lands.</p> <p>Section 810 imposes a bifurcated process. Under the first step, commonly referred to as a tier-I evaluation, the agency must consider: (1) the effect of the proposed activity on subsistence uses and needs, (2) the availability of other lands for the purposes sought to be achieved, and (3) other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. Tier-II obligations apply if, after completing the tier-I evaluation, the agency determines that the proposed activity would significantly restrict subsistence uses. Under tier-II, the agency is prohibited from proceeding with the proposed activity until it gives notice to the appropriate communities, holds hearings in those communities, and makes determinations that (1) "such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands," (2) "the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes" of the activity, and (3) "reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources."</p> <p>In the Draft EIS, the Bureau concluded that all three action alternatives and the cumulative case may result in a significant restriction to subsistence uses. These findings trigger the Bureau's obligations to give notice and hold hearings in potentially affected communities. It is critical that the Bureau includes information received during the Section 810 hearings in the agency's final evaluation. Currently, the Bureau's evaluation is largely based on data from the Alaska Department of Fish and Game (ADF&G) with only isolated references to Tribal expertise and Traditional Knowledge. The Bureau's heavy reliance on ADF&G data likely underestimates potential impacts on subsistence uses. ADF&G's harvest surveys are unable to account for the inherent variability in subsistence systems and many rural residents do not participate in these surveys, so the data collected may not accurately reflect actual harvests. This underscores the need for the Bureau to comprehensively incorporate the information gathered during the Section 810 hearings to address the holes in the agency's information and fulfill the agency's obligation to provide subsistence users with "a meaningful role" in the decision-making process.</p> <p>The Bureau's significant restriction findings also trigger a requirement to make certain determinations about the proposed action before proceeding. Specifically, the Bureau must determine whether "the proposed restriction of subsistence uses is necessary, that the minimal amount of 'public lands' are involved, and that reasonable steps have been taken to minimize the adverse impact on subsistence uses." These findings place substantive limits on the Bureau's decision-making and an affirmative duty to minimize impacts to subsistence uses. Maintaining all d-1 withdrawals fulfills the Bureau's Section 810 obligations and is the alternative most consistent with ANILCA Title VIII's underlying purpose to "provide the opportunity for rural residents engaged in a subsistence way of life to do so."</p>	EIS Appendix C, ANILCA 810 Evaluation, in the draft EIS relied on available information provided in EIS Section 3.14 and EIS Appendix G to characterize subsistence uses of the 223 study communities. Following the publication of the draft, the BLM conducted ANILCA 810 hearings in 19 communities during the 60-day comment period during the public scoping meetings, in addition to government-to-government consultation with Tribes. The information received in that hearing has been used in refining the subsistence analysis in the final EIS. For instance, the EIS analysis has been revised to analyze impacts by GMU and to incorporate Federal subsistence permit data to thoroughly describe potential impacts in the East Alaska planning area. The EIS has also been revised to address potential impacts to nonrural users of the 17(d)(1) withdrawals, and to provide additional, more detailed discussion of impacts on subsistence user access, resource abundance, and resource availability. Through these measures, the subsistence analysis is directly and indirectly informed by Indigenous knowledge, including knowledge provided during government-to-government consultation, public scoping meetings, and in existing ethnographic research based on interviews with Indigenous residents. Overall, these data are adequate for the BLM to make a reasoned choice among alternatives.	Y
14267-3	Grace Singh, Tim Gilbert	Maniilaq Association	Protections Under the Alaska National Interest Conservation Act The practice of traditional ways of life holds more significance to our communities than mere nutritional value. Ceremonial activities like fishing, hunting, gathering are sacred to the way-of-life of the Iñupiat communities. The	The cultural importance of subsistence is described in the introduction to EIS Section 3.14, Subsistence, and effects to subsistence are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N

ANILCA 810 Evaluation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			passage of precious cultural knowledge between generations and sharing of traditional foods throughout the community is how we define our society and culture. The continuation of these practices is essential to the survival of our communities. The disruption of these traditional ways of life through the revocation of the PLOs on ANCSA (d)(1) lands would have significant adverse impacts to cultures that have thrived in Northwest Alaska since time immemorial.		
14641-24	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS contains inconsistent findings regarding the number of communities that may be significantly impacted under Alternatives C and D. While the ANILCA 810 analysis indicates 91 communities may be significantly impacted due to development under Alternative C, the subsistence analysis indicates that number may be as high as 95. For Alternative D, the ANILCA 810 analysis concludes 117 communities may be significantly impacted due to loss of federal subsistence priority and that 119 may be significantly impacted due to development. However, the subsistence analysis indicates those numbers may be 119 and 102 respectively. In addition, while both the ANILCA 810 findings and subsistence analysis indicate 55 communities could be significantly impacted due to development under Alternative B, portions of the ANILCA 810 analysis refer to different numbers.109 In the final EIS, BLM should correct such discrepancies in its analysis.	EIS Appendix C, ANILCA 810 Evaluation, was edited to reflect clear and accurate numbers.	Y
14641-28	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM's ANILCA 810 cumulative effects analysis concludes that the same communities that may experience significant subsistence restrictions due to the loss of federal subsistence priority and development under Alternatives B, C, and D would experience significant subsistence restrictions in the cumulative case. In other words, like the deficient analysis of cumulative effects elsewhere in the DEIS, BLM concludes that no additional communities will be impacted in the cumulative case. There is no analysis supporting this conclusion. There is also no explanation of how this finding squares with BLM's acknowledgement that [p]ast, present, and reasonably foreseeable future activities, in combination with revocation of withdrawals on 17(d)(1) withdrawals, would increase the potential for impacts on subsistence users. This finding should be revised to include a broader range of communities in the final EIS. At a minimum, BLM must explain its conclusion that no further communities would be impacted.	Subsistence impacts from the cumulative case is an estimation of what may occur in the future. In the cumulative case, the analysis considers how this action added onto the reasonably foreseeable actions would affect subsistence. Where there are no foreseeable impacts from this action, it would not add onto the reasonably foreseeable actions to cause a significant restriction.	N
14641-29	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM also makes statements that seem to contradict or confuse its ultimate conclusion - that the cumulative case could result in significant impacts to the same communities directly and indirectly impacted under each alternative. BLM explains that "following a temporary loss of Federal subsistence priority on some subsistence lands for up to 113 communities, many Priority 3 and 4 lands would return to Federal ownership and thus gain Federal subsistence priority status." The DEIS explains that this means "most communities would experience a net gain in lands with Federal subsistence priority within their harvesting area once State Priority 3 and 4 lands are relinquished." BLM reports that only two communities would have a net loss in federal subsistence priority under Alternative B and that 12 communities would experience a net loss under Alternatives C and D. This discussion is confusing because BLM does not explain how its 'net gain' prediction relates to its finding that the cumulative case could significantly restrict subsistence for the same communities identified in its direct and indirect impact analysis. It is also misleading because BLM does not address development related impacts relevant to the net gain or loss of the federal subsistence priority. The conclusion drawn appears to suggest that, in the long run, subsistence impacts will be similar regardless of which lands become effective State selections because subsistence users will regain a similar amount of land with federal subsistence priority. But this does not account for the increased likelihood of development within the State's Priority 1 and 2 lands as compared to its Priority 3 and 4 lands.	This comment addresses the long-range impacts of State selections, which is often confusing. The Alaska Statehood Act provides the State a finite amount of land. All of the land conveyed to the State via the Alaska Statehood Act will lose the Federal subsistence priority. However, ANILCA allowed the State to overselect. Since selected lands are not considered public lands for the purposes of Title VIII of ANILCA, these selections close the land to Federal subsistence priority. The State has prioritized its selection from 1 to 4. In the long run, the EIS assumes all Priority 1 and 2 selections would be conveyed to the State, and those lands would no longer be available for Federal subsistence priority. Also in the long run, the EIS assumes all Priority 3 and 4 selections would return to Federal subsistence priority. The analysis found that in most areas, the decrease in lands available for Federal subsistence priority from State Priority 1 and 2 top filings being eventually conveyed would be more than offset by the lands that would return to Federal subsistence priority, thus resulting in a net gain in lands managed under Federal subsistence priority. However, this effect of the lands coming back into Federal subsistence priority would happen whether the proposed revocation goes forward or not, so even though there is a net gain, the communities would not gain as much land back into the Federal subsistence priority management as if the action had not occurred.	N
14641-31	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center;	the DEIS does not meaningfully address the impact of shifting which lands, within a community's subsistence use area, are subject to the federal subsistence priority. First, "[t]here is no established timeline for the BLM to convey or the State to relinquish selections." This means, any "eventual return" of lands to federal management could stretch far into the future. Moreover, while the DEIS briefly recognizes that even the short-term loss of federal subsistence priority could result in longer term impacts, additional detail is necessary to avoid the suggestion that only communities with a 'net' loss of such lands will be harmed. Specifically, BLM should explain that when subsistence users stop using areas for subsistence "the opportunity to transmit traditional knowledge to younger generations about those traditional use areas would be diminished." And as a result, "[a]ny changes to residents' ability to participate in subsistence activities. . . could have	EIS Appendix C, ANILCA 810 Evaluation, was edited to elaborate on the potential longer term cultural and social impacts of the loss (even temporary) of Federal subsistence priority and increased potential for development.	Y

ANILCA 810 Evaluation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
		Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	long-term or permanent effects on the spiritual, cultural, and physical wellbeing of the analysis communities." BLM should expand its cumulative case analysis to include a discussion of these impacts and clarify its finding regarding which communities are expected to experience significant subsistence restrictions in the cumulative case.		
14641-32	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM's discussion of "other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes" should also be clarified. BLM correctly states that "[t]he amount of land the State can receive is defined by the Alaska Statehood Act, and no actions taken by the BLM can reduce or eliminate that disposition of the public lands." However, the conclusion that Alternative A "would not reduce the disposition of public lands but merely shift it to another part of the State" should be corrected. The Purpose and Need statement indicates BLM's analysis is intended to determine whether lifting the withdrawals is in the public interest. This means the correct inquiry is whether Alternative A reduces the amount of land for which BLM would lift the withdrawals - not whether Alternative A reduces the lands the State is entitled to. Revising this approach in the final EIS would comply with BLM's policy guidance which directs BLM to consider the proposed action itself. BLM's policy indicates that that viable alternative actions must be "reasonable, physically and technically possible, economically feasible, and capable of reducing or eliminating the proposed action(s) from lands needed for subsistence purposes." BLM should revise its analysis to indicate that Alternative A meets this definition.	The statement under Alternative A is correct. When the BLM conducts the ANILCA 810 analysis, it determines how the alternative would affect subsistence access. In this case, in the long run, choosing Alternative A would not decrease the lands which would lose Federal subsistence priority, but would only shift the loss away from the areas under consideration.	N
14641-33	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The cumulative analysis also fails to address the full extent of likely subsistence impacts in light of reasonably foreseeable future exploration and development. As a preliminary matter, the cumulative impacts analysis does not expressly include or describe exploration impacts. Exploration impacts can be significant and should be analyzed in the final EIS. In addition, the cumulative analysis does not explain that reasonably foreseeable future activities (RFFAs) could significantly increase the portion of each community's subsistence use area that is likely to be developed as depicted in the maps in Appendix G. Taking again the community of Kiana as an example, maps in the DEIS indicate only a small portion of the community's subsistence use area is considered more likely to be developed. But RFFAs could significantly increase development related subsistence impacts to Kiana and surrounding communities. For example, the proposed 211-mile industrial access road would terminate in the region of Kiana's subsistence use area. The road would facilitate large scale industrial mining in the Ambler Mining District if constructed and would likely increase the potential for development in and around Kiana's subsistence use area. Yet, the DEIS does not explain that communities surrounding the Ambler Road would likely face a greater likelihood of future development as a result of the roads construction. In the final EIS, BLM must analyze the increased risk of development associated with reasonably foreseeable ROWs and make clear that subsistence use areas in the vicinity of such projects would likely increase the level of development predicted by the DEIS. This acknowledgement would align with BLM's determination that development is more likely in areas proximate to transportation corridors and industrial development. BLM should also include maps depicting development's likely impact on subsistence in light of reasonably foreseeable future development such as the Ambler Road and mining in the Ambler Mining District.	EIS Section 3.14.3.2.7, Cumulative Impacts, was edited to ensure reasonably foreseeable future actions such as the Ambler Road are adequately addressed in the context of additional development.	Y

Alternatives					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13484-2	John Sonin	Civilized Humanity	Eliminate the numerous loopholes in the so-called conservation alternative that would allow for harmful infrastructure and activities in areas that are identified as no surface occupancy (NSO). The NSO requirements should instead provide maximum protection	As described in EIS Section 3.1, Introduction and Methodology, no stipulations are attached to selected lands should they be conveyed to the State or ANC. If lands stay in Federal management, they would be managed per their RMP, including any existing NSO requirements.	N
13484-3	John Sonin	Civilized Humanity	The conservation alternative should limit the leasable area to no more than the minimum needed for any mandatory sale, and not an acre more.	See response to comment 13484-2.	N
13484-4	John Sonin	Civilized Humanity	Better protect vitally important polar bear denning areas in the northwestern part of the Refuge. Even under the conservation alternative, those areas inexplicably remain vulnerable to seismic exploration, which poses severe danger to polar bear cubs. The proposed conservation alternative fails to provide adequate protection to this incredibly imperiled population.	The EIS decision area excludes polar bear critical habitat as discussed in EIS Section 1.2, Background, and there are no known polar bear dens in the decision area. As described in EIS Section 3.1, Introduction and Methodology, if lands stay in Federal management, they would be managed per their RMP, including any potential terms and conditions, required operating procedures, or best management practices, as applicable to denning habitat and the BLM would consult with the USFWS before any actions occur that could affect polar bear.	N

Alternatives					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13486-5	John Strassenburgh		The world class Bristol Bay fishery is well known. None of the d-1 withdrawals within the Bay Planning Area should be revoked. This applies especially, but not exclusively, to those d-1 lands between Lake Iliamna and Bristol Bay, including the Nushagak and Kvichak Rivers and all Bristol Bay tributaries.	See response to comment 14462-6.	N
13851-2	Margaret Stern	Susitna River Coalition	The Susitna Watershed is in the fastest growing region of the state and likely enjoys the most subsistence and commercial use of any other watershed within the state. This region is high risk due to its proximity to a growing populace. Due to this high level of use, all lands within the bounds of the Susitna watershed should be protected to maintain the opportunities that make Alaska a desirable place to live.	Retaining all withdrawals, including the lands in the comment, is evaluated in Alternative A, as described in EIS Section 2.2, Alternative A. The Secretary of the Interior has the discretion to choose any combination of revocations of 17(d)(1) withdrawals within the analyzed range of alternatives.	N
14052-5	Tisha Kuhns	Calista Corporation	List of specific lands Calista urges be kept in full ANCSA 17(d)(1) withdrawal status to keep them available to fulfill ANCSA statutory land entitlements [3 page list of township, range, section details in comment letter].	These lands would be retained under both Alternative A and B.	Y
14127-3	Allan Chen		Alternative B is a version of Alternative A. It has no substantive effect on either management by the State of Alaska or by BLM. This is because all valid selections by the State temporarily closes federal land from the operation of the US Land Laws or the US Mining and Mineral Leasing Laws. The temporary closure remains in full force and effect until either BLM transfers ownership to the State of Alaska or the selection is relinquished by the State of Alaska. The ANCSA withdrawal under Section 17(d)(1) is redundant and does not change interim management decisions, if any, by BLM.	As described in EIS Section 3.1, Introduction and Methodology, the State and most ANCs are overselected and eventually some effective selections will have to be relinquished by the selectee or rejected by the BLM. When this happens, the selection will no longer segregate the land from the public land laws or entry under the General Mining Law. Operation of the U.S. land laws or the U. S. mining and mineral leasing laws will apply to those lands unless prevented by a PLO. Tables presented in Chapter 3, Affected Environment and Environmental Consequences, describe the acreage differences between Alternative A and Alternative B for each analyzed resource. All of the land opened in Alternative B is expected to be conveyed to the State within 10 years of the recommended revocation if the land is otherwise unencumbered. While the segregation of the lands in the interim would act in some ways like the current withdrawal, in the end, Alternative B would result in these lands leaving Federal ownership based on the assumption all Priority 1 and 2 effective selections would be conveyed to the State and increasing the likelihood of development of those lands.	N
14127-5	Allan Chen		Alternative D would revoke all withdrawals under ANCSA Section 17(d)(1). With a caveat, I support this alternative since it streamlines the existing piece-meal process of changing the General Land Office Records maintained by BLM in Alaska. My caveat is ANCSA Section 17(d)(1) withdrawal top filed by a withdrawal under ANCSA Section 17(d)(2) also be relinquished.	PL0 5179, which withdrew the lands pursuant to both ANCSA 17(d)(1) and 17(d)(2), is included within the proposed withdrawals for revocation. The withdrawal pursuant to ANCSA 17(d)(2) within that order has already expired and is accurately reflected in BLM records.	N
14267-2	Grace Singh, Tim Gilbert	Maniilaq Association	The proposed Alternatives B-D are too limited to address the numerous situations in the various regions. Some federal agencies significantly underestimate the sheer geographical magnitude of Alaska's landscape. ANCSA created regional and local entities to address natural resource management needs specific to each community. Even more crucial to the protection of traditional ways of life, 229 tribes were recognized in Alaska in order to preserve the unique cultural identity and heritage that Alaska's vast geographical landscape produced.	The Secretary of the Interior has the discretion to select any combination of revocations or retention of 17(d)(1) withdrawals within the range of the analyzed alternatives. Effects to cultural resources are described in EIS Section 3.4, Cultural Resources.	N
14267-4	Grace Singh, Tim Gilbert	Maniilaq Association	Under Section 3.14.1.1.2, BLM provides information indicating that almost all BLM-designated subsistence analysis communities within the five RMPs make use of subsistence use areas that also overlap with lands under 17(d)(1) withdrawals. This information, together with the information in the paragraph above, highlights the critical role of the Federal government in protecting subsistence on public lands and of the necessity for retaining 17(d)(1) land withdrawals that overlap of subsistence use areas. Considering how vitally necessary subsistence is to the survival of rural Alaskans, and especially the survival of Alaska Natives' culture and traditions, the federal protections afforded for subsistence access and use on 17(d)(1) withdrawals need to remain in place to protect subsistence access and use areas. Therefore, we recommend BLM continue to retain the 17(d)(1) land withdrawals that overlap subsistence use areas as part of any proposed alternative or final decision.	The importance of Federal subsistence priority is described in EIS Section 3.14, Subsistence.	N
14377-1	Kenneth O'Brien		I hope that the BLM will protect critical habitat of the wildlife we hunt and enjoy sharing our homes with, and keep these areas free from any development that might threaten the communities that rely on them, including Native Alaskans and other hunters and anglers.	As described in EIS Section 3.2, Birds and Special Status Bird Species, and EIS Section 3.15, Terrestrial Mammals, no Federally designated critical habitat would be impacted. Therefore, no alternative was created that protects critical habitat for wildlife. General wildlife habitat would be impacted, as described in EIS Section 3.2, Birds and Special Status Bird Species; EIS Section 3.7, Fish and Aquatic Species; and EIS Section 3.15, Terrestrial Mammals. Unique habitat areas (such as those in proposed or existing ACECs) would remain withdrawn under Alternative B (see EIS Section 2.3, Alternative B). Public access is analyzed in EIS Section 3.11.1, Recreation Management and Public Access.	N

Alternatives					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14378-10	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	We would like to see alternatives within the DEIS for D1 withdrawals that include specific guidelines for establishing co-management agreements with Tribal governments, and alternatives that focus on the need for climate change adaptation, resilience and mitigation planning through ongoing scientific research across all BLM lands to understand the impacts of climate change on existing land use activities, and the additional impacts on climate change for any future permitted activities.	As described in EIS Section 2.6, Alternatives Considered but Eliminated from Detailed Analysis, these alternatives were not carried forward into detailed analysis because they are outside the scope of this analysis. See EIS Section 1.4, Decisions to be Made. The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals and will not make decisions on co-stewardship or management decisions for particular resources; the suggestion is outside the scope of the EIS.	N
14414-5	Sarah Obed	Doyon, Limited	<p>As the DEIS explains, "The BLM considered alternatives that would provide different proportions and configurations of 17(d)(1) withdrawals that would be retained or revoked in the five planning areas. Each of the alternatives identifies 17(d)(1) withdrawals in the five planning areas as retained or revoked. The alternatives range from retaining the withdrawals on all lands (Alternative A) to revoking the withdrawals on all lands (Alternative D). Alternatives B and C include partial revocations based on landscape and cultural features." DEIS, p. 2-1. Thus, the current alternatives allow for no differentiation between regions. As one region goes, so must the others.</p> <p>As noted above, BLM has said that the most effective and preferred means for managing the process for lifting of withdrawals in through the agency's land use planning process. Section 207 Report, p. 5. As discussed above, BLM has proceeded accordingly for years. As also discussed above, regional planning processes enable BLM, stakeholders, and the public to consider the withdrawals in the context of the land management classifications and policies that are otherwise applicable to specific areas. They allow for consideration of regional differences in resources, land uses, land ownership and selection, and other relevant factors.</p> <p>In short, a regional approach is much better suited to addressing the future of the 17(d)(1) withdrawals than this current statewide exercise. BLM has recognized as much, both when it declared that the appropriate forum for addressing the future of the 17(d)(1) withdrawals is the management planning processes for the respective planning areas, and when it dedicated years of time and significant resources to developing RMPs on that basis.</p> <p>Accordingly, in the event BLM continues to go down this path of revisiting its earlier recommendations on the 17(d)(1) withdrawals, Doyon urges BLM to identify and consider additional alternatives that approach the revocation or retention of 17(d)(1) withdrawals on a regional basis, rather than limiting the range of alternatives in a way that requires the same result for every one of the five planning areas.</p>	See response to comment 14579-7 regarding the BLM's 2006 report. On evaluating additional alternatives, see response to comment 14267-2.	N
14462-6	Geoffrey Parker	Bristol Bay Fishermen's Association	First, as said at the outset, BLM should retain the PLO's that help conserve the Bristol Bay drainages because revoking them would make efforts to conserve those drainages more complicated, whether by EPA's §404(c) determination and by federal legislation. However, BLM needs to do more than simply retain the PLO's that help conserve the Bristol Bay drainages.	The EIS evaluates Alternative A, which would retain all withdrawals, including any that could impact Bristol Bay drainages. Any actions outside of whether to retain or revoke the lands is outside of the scope of the EIS, as described in EIS Section 1.3, Purpose and Need for Action. The Secretary of the Interior has the discretion to choose any combination of revocations of 17(d)(1) withdrawals within the analyzed range of alternatives.	N
14563-4	Michael Spindler		BLM participated in and supported interdisciplinary studies to identify ecological benchmarks for adaptive management based on nine focal species in context with locations of adjacent conservation units such as refuges and parks (see Lisgo et al. 2018). The final D1 EIS should include varying amounts of D1 retentions in the range of alternatives to support ecological benchmarks for adaptive management in multiple-use landscapes as recommended by Lisgo et al. 2018 (and similar to what is included in the Central Yukon RMP DEIS).	See response to comment 14378-10.	N
14579-9	Deantha Skibinski	Alaska Miners Association	<p>Alternatives B and C do not meet BLM's Multiple Use mandate as it pertains to making BLM land available for mineral exploration and development.</p> <p>FLPMA Sections 102(a)(12), 103(c) and 103(1) clearly state that minerals are one of the "principal or major" multiple uses to be allowed on BLM lands.</p> <p>In Alternative B (Partial Revocation) the DOI would revoke partial withdrawals that would only allow the State top filed Priority 1 and 2 lands to convert to effective selections where conflicts with natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing areas of critical environmental concern (ACECs) would be minimized. All other lands would remain withdrawn. Alternative B is only trivially different than Alternative A. It removes half a dozen small areas that the State has requested but keeps 99% of the PLOs intact. It also establishes BLM as the sole determiner of any perceived "conflicts" with no criteria, boundaries or independent review defined.</p> <p>Alternative C (Partial Revocation) is misleading as it pertains to mineral entry as it also revokes very little and provides too many unsupported "reasons" (e.g. inadequate ACECS) for even further limiting areas open to mineral entry.</p>	<p>With respect to meeting the multiple use mandate, see response to comment 14579-2.</p> <p>Known cultural resource sites, special designations (designated through the land use planning process that involves public input), and areas identified through community input, government-to-government consultation, and BLM specialist input were retained in Alternative B.</p> <p>The EIS evaluates a range of alternatives from retaining all withdrawals to revoking all withdrawals, as described in EIS Chapter 2, Alternatives. The Secretary may choose any combination of revocations of 17(d)(1) withdrawals evaluated within the range of alternatives. The tables provided in EIS Sections 3.8.1.2.6, 3.8.2.2.6, and 3.8.3.2.6, Minerals, Comparison of Alternatives, describe the differences in acres opened to mineral entry, leasing, or sales by alternative.</p>	N

Alternatives					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14579-11	Deantha Skibinski	Alaska Miners Association	<p>Alternatives B and C improperly tie decisions regarding d-1 withdrawal revocations to Areas of Critical Environmental Concern (ACECs).</p> <p>In previous comments on RMPs, AMA has repeatedly voiced concerns that consistent with Congress' intent in FLPMA, ACECs are not an appropriate tool to for designating large blocks of land for general conservation purposes. Congress intended their use to be a vehicle to provide special management prescriptions to protect important resources from "irreparable" damage within the context of FLPMA's multiple use mandate. They were not intended to create de facto Conservation System Units. The proposed d-1 rule stretches ACECs beyond their statutory basis by using ACECs to justify retention of d-1 withdrawals.</p>	The range of alternatives includes alternatives where ACECs do not remain withdrawn. The EIS analyzed a sufficient range of alternatives.	N
14590-4	Denis Ransy		The lands in the upper Talkeetna River and upper Clear (Chunilna) Creek should be retained with D1 protections. These lands are the habitat for so much rich fish and wildlife and natural undeveloped resources upon which much of the southcentral Alaska economies are based.	See response to comment 13851-2.	N
14591-1	Geoffrey Parker	Bristol Bay Fishermen's Association	Third, because most of the public land in the Kvichak and Nushagak drainages is state public land, the state subsistence priority, rather than the federal subsistence priority, applies. That leaves rural subsistence users less protected and justifies a greater effort by the federal government to assist in conserving non-federal lands in the Kvichak and Nushagak drainages.	See response to comment 13851-2. Alternatives B and C also retain many of the lands in the Kvichak and Nushagak drainages, which would keep the lands under BLM management.	N
14639-1	Heather Payenna	King Island Native Community	<p>Kigluaik Mountains Kateel River Meridian, Township 5 South, Range 33 West, ALL; Township 6 South, Range 33 West, ALL El Dorado River Kateel River Meridian, Township 10 South, Range 31 West, Section 32; Township 9 South, Range 31 West, Sections 6,7,17, 18, 19, 20, 21</p> <p>The concerns have been raised due to subsistence food reliance, sustainability and detriment to the critical habitat should the protections get lifted. We are requesting an alternative be made in reference to these sections as BLM continues to draft the EIS for the public areas which will negatively impact the King Island Native Community tribal community and surrounding communities threatening the traditional and cultural lifestyle within the region.</p>	See response to comment 13851-2. Additionally, these withdrawals are largely retained under Alternative B, and some withdrawals are retained under Alternative C.	N
14682-5	Saagulik Hensley	NANA Regional Corporation	<p>And finally, the EIS should have numerous proposed alternatives. This goes to the issue of the EIS being too broad and covering all 17(d)(1) withdrawals in Alaska.</p> <p>Another consideration is that the current proposed alternatives B through D are focused too much on the State of Alaska selections and subsequent conveyances of top file lands rather than the classification or reclassification of the 17(d)(1) withdrawals.</p>	<p>See response to comment 13927-1 with regard to the analysis being too broad. EIS Section 2.1, Alternative Development Process, describes how the four alternatives were selected for detailed analysis.</p> <p>As described in EIS Section 1.4, Decision to Be Made, the decision would not affect current effective selections by the State or ANCs because they could be conveyed regardless of the Secretarial decision. Thus, the analysis focuses on top filings, which would be affected by the Secretarial decision.</p> <p>Additionally, as described in EIS Section 1.3, Purpose and Need For Action, the purpose of the EIS is not to classify or reclassify 17(d)(1) withdrawals. The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals.</p>	N
14702-13	Catherine Heroy	State of Alaska	The Consolidated Appropriations Act of Fiscal Year 2023 (CAA2023) (Pub. L. 117-328) provided a mechanism for the University of Alaska to select and receive title to lands selected or top-filed by the State. The Congressional intent of CAA2023 is to allow the University to select any lands they deem appropriate to their land grant and fiscal needs. Alternatives B and C deprive the University's ability to acquire lands and is contrary to Congressional intent in CAA2023.	Like the State, the University of Alaska can only receive lands that are vacant, unappropriated, and unreserved. The university is able to select the State's top filings, but like the State, its selection would only become effective, and therefore an actual ability to select, if it becomes available. Given this, the alternatives that do not open the lands to State selection are not depriving the university of any ability that it currently holds. As is true for the Alaska Statehood Act, ANCSA, ANILCA, and ALTAA, nothing in the law requires the Secretary to make these lands vacant, unappropriated, and unreserved lands.	N
14759-1	Dan Gillikin		<p>Anyway, so under Alternative C you've got a real mix of retained designations and then fully revoked, especially for the Bering Sea Western Alaska region. That's the Upper Kuskokwim, Upper Yukon area.</p> <p>I'm wondering what criteria, primarily, that you used to designate or propose the areas that you did in that region for fully revoking the withdrawals? Is it primarily mineral entry?</p>	EIS Section 2.4, Alternative C (Partial Revocation), describes the intent of alternative and the rationale for the 17(d)(1) withdrawals that are considered for revocation. Alternative C fully revokes withdrawals that have high mineral potential and are not already open to mineral entry or leasing and partially revokes any remaining State Priority 1 and 2 lands that are not within the high mineral potential area.	N

Alternatives					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
2-1	Kevin Parker		<p>I'd suggest that a reader should be able to grasp the general outline of the project from the abstract and at least have a basic understanding of the alternatives from the page executive summary at the start of the PDF. The current language of the abstract and alternatives is difficult to interpret. For example, Alternative A: Alternative A (No Action Alternative), in which the DOI would retain the withdrawal of all lands currently subject to ANCSA 17(d)(1) withdrawals within the decision area, preserving the status quo as it was in 2021.</p> <p>DOI would retain the withdrawal of the withdrawals? This is hard to understand. Perhaps a sentence is needed to clarify what "preserving the status quo" means. Does Alternative A retain the protections against mining and oil extraction? Does that preserve the status quo of the withdrawal, upholding the decision to withdraw those protection of ANCSA lands?</p>	The details that are requested are described in EIS Chapter 2, Alternatives. Alternative A is described in EIS Section 2.2, Alternative A.	N

Birds and Special Status Bird Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13581-1	Kurt Schwarz	Maryland Ornithological Society	<p>D-1 lands are home to several bird species that are declining in population, so that Audubon Alaska has placed them on its Red List of species warranting special conservation attention: Red-necked Grebe, Greater Scaup, Spectacled Eider, Black Scoter, Lesser Yellowlegs, Pectoral Sandpiper, Dunlin, Black-legged Kittiwake, Aleutian Tern, and Bank Swallow.¹ The Spectacled Eider is another species considered Near Threatened by the IUCN. Greater Scaup, Black Scoter, Dunlin, and Black-legged Kittiwake winter in Maryland, while Lesser Yellowlegs, Pectoral Sandpiper pass through as migrants. Bank Swallows also breed in Maryland. These species bring delight to birders during migration and winter. Other species, which are not necessarily of conservation concern breed in Alaska, some on D-1 lands, and winter in Maryland: Tundra Swan, Canvasback, Bufflehead. These species bring delight to Maryland birders during migration and winter.</p>	Lands where the 17(d)(1) withdrawals are revoked and that are conveyed to the State would result in a loss of BLM management for BLM special status species. Therefore, the EIS uses the BLM special status bird species list to evaluate species of conservation concern rather than other lists of birds warranting special concern such as the Audubon Alaska Red List. Additionally, the EIS evaluates high-value bird habitat for all migratory species.	N
13581-2	Kurt Schwarz	Maryland Ornithological Society	<p>We note that several D-1 lands exist on the Nome Peninsula to the north of the town of Nome. Nome is a popular birding destination, with numerous bird touring companies making trips there in June. These trips travel the roads out of Nome. Kougark Road goes north from Nome, and birding trips travel it seeking such desirable species as Bristle-thighed Curlew, Wandering Tattler, Gyrfalcon, and Bluethroat. These species are exclusive to Alaska in the United States. Kougark Road passes right through D-1 lands to the north of Nome. Habitats for these species could be impacted. The Bristle-thighed Curlew is considered Near Threatened by the International Union for the Conservation of Nature (IUCN). The Nome-Teller Highway, another popular birding route, skirts D-1 lands on its northeast side.</p>	See response to comment 13406-3. The importance of 17(d)(1) withdrawals to tourism, which would including birding, is addressed in EIS Section 3.5.1.1.4, Recreation Economy.	Y
13581-3	Kurt Schwarz	Maryland Ornithological Society	<p>D-1 lands also sequester carbon. We must protect carbon sinks as our climate changes. Climate change presents an existential threat to our bird life. Rising seas are a threat to species that nest in a narrow band along the coast such as Black Rails and Saltmarsh Sparrows. North America has lost nearly 30% of its birds since 1970, with even common birds in steep decline, which result in profound changes to ecosystems.</p>	Climate change is an existing condition and reasonably foreseeable trend that is described in EIS Section 3.2.1.1, Birds and Special Status Bird Species, Affected Environment. Climate change and declining avian populations are addressed in EIS Section 3.2.1.2.7, Birds and Special Status Bird Species, Cumulative Impacts. The 25% decline of North American avifauna is described in EIS Section 3.2.1.1, Birds and Special Status Bird Species, Affected Environment. Neither black rail nor saltmarsh sparrow ranges within the decision area or Alaska in general, and the reasonably foreseeable development is not projected to have an appreciable effect on these species.	N

Birds and Special Status Bird Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13628-19	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The DEIS states that "critical habitat is designated for spectacled eider...and Steller's eider but these critical habitats are marine habitats and would not be impacted by the project" (p.3-27). However, Map 23 in the Kobuk-Seward RMP displays habitat for threatened, endangered, and candidate species, including these two eiders (BLM 2008). These habitat designations appear to overlap some D1 Withdrawals, conflicting with the DEIS' claim of no impact. This information should be reassessed to confirm which is inaccurate and the statement be clarified in the FEIS. Furthermore, the DEIS states, "For lands where a 17(d)(1) withdrawal is revoked under Alternative C, the impacts to special status bird species would be the same as Alternative B, but to a greater magnitude and extent because an additional 474,000 acres of 17(d)(1) withdrawals would be revoked in the focused analysis area (Table 3.2-8). Additionally, 17(d)(1) withdrawals would not be retained specifically to avoid conflict with bird habitat as they would for Alternative B (such as avoiding high densities of nesting yellow-billed loons)" (p.3-30). For ESA candidate species like yellow-billed loons, it would be a best practice policy to err on the side of caution to preserve loon habitat. It is unclear what constitutes a "high density" threshold. This needs to be better defined and quantified in the FEIS so the reader can understand the potential effects to yellow-billed loon nesting habitat. We appreciate the Birds Technical Appendix (Appendix E), which extensively maps the areas of shorebird habitat by region. We recommend BLM create similar maps for Steller's eiders, Kittlitz's murrelets, and Yellow-billed loons, given their status.	EIS Section 3.2.2.1, Affected Environment, states that "Critical habitat is designated for spectacled eider (66 FR 9146)." Critical habitat as designated under the ESA may not encompass all possible areas used by a species. Map 3-15 in the Kobuk-Seward Peninsula RMP shows designated critical habitat for spectacled eiders, only in marine areas, and some general habitat in terrestrial areas, not designated as critical for Steller's or spectacled eiders. The yellow-billed loon is not a candidate species for listing under the ESA; the USFWS made a final determination in 2014 that they did not warrant protection under the ESA (79 FR 59195). All current ESA-designated species are discussed in Section 3.2.2, BLM special status bird species and Endangered Species Act bird species. EIS Appendix E, Birds Technical Appendix, mapped birds by species groups, including seabirds (including Steller's eider and Kittlitz's murrelet), and waterbirds (including yellow-billed loons). Concurrence was received from the USFWS on 3/11/2024 (see EIS Section 1.8.4, Endangered Species Act Consultation).	N
13631-1	Mark Anderson, Jan Crichton		Some areas sustain specific populations that require these areas, such as the Chilkat River watershed, where eagles from all over N America come in the fall & winter to eat the only fish available. Without a healthy Chilkat watershed, many eagles would starve, or would be too weak to succeed at raising young the following spring.	High-value raptor habitat is identified in the Ring of Fire planning area (Figure E-5 in EIS Appendix E, Birds Technical Appendix), which includes portions of the Chilkat River watershed. Bald eagles are not specifically discussed because they are not a BLM special status species or ESA bird species.	N
13766-4	David Jonas	Alaska Homestead Adventures LLC	We are additionally concerned about the impact of opening these lands to development on the millions of migratory birds who use the arctic for vital nesting and breeding habitat.	Effects to migratory birds are described in EIS Section 3.2, Birds and Special Status Bird Species.	N
14004-1	Sarah Hoepfner	Alaska Shorebird Group	We are writing to voice our concerns and to urge you to take the no action alternative in the 17(d)(1) land withdrawals across the state of Alaska. We acknowledge that the draft environmental impact statement (DEIS) recognizes several special status species that will likely be affected by loss of habitat due to increased development. However, there is minimal recognition of specific areas recognized as important shorebird habitat that will be directly affected by this land withdrawal. In addition, there is lack of information on specific shorebird species, their habitat use, and how future developments may affect shorebirds during different stages of their annual cycle (i.e., migration sites vs. breeding sites). Finally, there is insufficient information on how Native Alaskan subsistence harvest of adult shorebirds and their eggs may be impacted. The proposed opening of 17(d)(1) lands for leasing has the potential for significant loss and modifications of habitats used by shorebirds to refuel during migration and raising young, therefore, likely lowering their reproductive output. The main threats to many shorebird species in Alaska include not only habitat loss but increased predation due to development and pollution (ADFG 2006, ASG 2019), and the revocation of protected 17(d)(1) lands would directly impact the pristine and important habitats listed below and more.	Specific areas are not named; however, important shorebird habitat is mapped across all planning areas (see Figures E-11, E-12, E-13, E-14, and E-15 in EIS Appendix E, Birds Technical Appendix). Individual species, not classified as BLM special status species, are not addressed in the EIS. Per 40 CFR 1502.2, an EIS shall not be encyclopedic; this information is not essential for the Secretary to make a reasoned choice among alternatives. Subsistence harvest of adult shorebirds in Alaska is very low, with the exception of the bar-tailed godwit on the Yukon-Kuskokwim Delta (ASG 2019). Increased predator populations associated with development are addressed in EIS Section 3.2.1.2.2, Birds and Special Status Bird Species, Impacts Common to All Action Alternatives.	N
14004-3	Sarah Hoepfner	Alaska Shorebird Group	Previous shorebird research has shown the importance of areas for shorebirds during both migration and breeding within the proposed 17(d)(1) withdrawal lands. Norton Bay is an important shorebird area that supports approximately 28,000 nesting shorebirds and an important feeding and staging area for up 18,000 individuals in the fall prior to migration. The central Seward Peninsula supports several species of concern that nest in relative high densities, including the Bar-tailed Godwit, Whimbrel, Pacific Golden-Plover, and high densities of the <i>roselaari</i> subspecies of Red Knot. The Shishmaref Inlet is a highly productive complex of intertidal mudflats that support approximately 225,000 shorebirds during the fall migration. Kvichak and Nushagak Bays are also extensive mudflats that support over 44,800 shorebirds during fall migration, and both are recognized as an area of Regional Importance by the Western Hemispheric Shorebird Reserve Network (Savage and Payne 2013).	Important shorebird habitat was mapped for shorebirds in terrestrial areas near Norton Bay, in the central Seward Peninsula, and Shishmaref Inlet (see Figure E-14 in EIS Appendix E, Birds Technical Appendix). Marine habitat would not be affected by any Secretarial decision from the EIS. There are no 17(d)(1) withdrawals in the decision area near Nushagak or Kvichak bays (see Figures E-12 and E-15 in EIS Appendix E, Birds Technical Appendix).	N

Birds and Special Status Bird Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14004-4	Sarah Hoepfner	Alaska Shorebird Group	In Alaska, 37 shorebird species are regular breeders, and of those three species and five subspecies breed solely within Alaska and in the areas designated for the D-1 withdrawals (Page and Gill 1994). We are particularly concerned about potential threats to the Bristle-thighed Curlew (<i>Numenius tahitiensis</i>), a species of greatest conservation concern with an estimated population size of 10,000 (Marks et al. 2020, ASG 2019) that have a breeding area restricted to two areas, the central Seward Peninsula and Nulato Hills (Marks et al. 2020), both of which are included within the 17(d)(1) withdrawals. The montane tundra of the central Seward Peninsula supports breeding habitat for 40% of the global population of Bristle-thighed Curlew. One additional reported potential issue negatively affecting this species is "road construction and increased human access to the Seward Peninsula" (ADFG 2006). Another species of particular concern is the Red Knot (<i>Calidris canutus roselaari</i>), which numbers approximately 22,000 individuals (Lyons et al. 2016), and breeds in the Central Seward Peninsula and mountain areas north of Kivalina. Both areas are slated for D-1 land withdrawals and development could lead to lower breeding effort and ultimately population declines.	Impacts to red knot and bristle-thighed curlew are described in EIS Section 3.2.2.1, Birds and Special Status Bird Species, Affected Environment, because they are BLM special status species and would lose the benefits of BLM protections on lands that are conveyed out of Federal management.	N
14031-1	River Gates	National Audubon Society / Audubon Alaska	According to the DEIS, BLM special status birds and other bird species use nearly 10 million acres of high-value bird habitat for foraging, nesting and migration within the proposed project area. We agree with the points made in the DEIS regarding the negative impacts of direct habitat loss, habitat fragmentation and industrial and recreational disturbance that will occur if the D-1 lands are developed. Section 3.2.1.2.2. in the DEIS clearly states: "Loss of high-value bird habitat is expected to occur on some of the lands where 17(d)(1) withdrawals are revoked". With many bird species in apparent declines, continuing loss of critical nesting and migration stopover habitat will be unmitigated fragmentation of wildlife habitat across many important ecosystems in Alaska.	The cumulative effects of reasonably foreseeable and planned actions on breeding success are described in EIS Section 3.2.1.2.7, Cumulative Impacts. The impacts of habitat loss, including both nesting and stopover habitat, are discussed in EIS Section 3.2.1.2.2, Impacts Common To All Action Alternatives. Additional text was added to EIS Section 3.2.1.2.7, Cumulative Impacts, to address habitat fragmentation.	N
14031-2	River Gates	National Audubon Society / Audubon Alaska	Lifting D-1 protections and opening these lands to extractive industrial development would fragment some of our country's last remaining intact landscapes, impact important salmon streams, and affect migratory corridors for large mammals and birds. An increase in human activity in the proposed area, development of roads and infrastructure, habitat fragmentation due to increased human activity, exposure to contaminants, increase in habitat modification are threats that will increase if the areas are open for mineral exploration. BLM DEIS also recognizes the impact the proposed alternatives would have on 27 Special Status bird species including 3 raptors, 2 seabirds, 8 shorebirds, 7 waterbirds, 7 landbirds and notes that there will be loss of high-value bird habitat common to all action alternatives.	Effects to BLM special status species are described in EIS Section 3.2.2, BLM Special Status Bird Species and Endangered Species Act Bird Species. Additional text about habitat fragmentation was added to EIS Section 3.2.1.2.7, Cumulative Impacts.	Y
14641-41	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM ANCSA 17(d)(1) lands offer important habitat for a variety of bird species including three species listed under the ESA. In addition to ESA-listed species, there are numerous BLM Special Status species that may be impacted by BLMs decision. All 27 BLM Special Status bird species have declining populations due to habitat loss and fragmentation, climate change, changing predator populations, and changing prey populations. BLM uses its special status species list for planning purposes to avoid and minimize potential negative impacts of any proposed project or decision on special status species on BLM-managed lands, with the goal of preventing the need to list them under the ESA in the future.	See response to comment 14031-2.	Y
14681-2	Emily Johnson	National Park Service	The D1 lands identified on the Malaspina forelands include known Kittlitz's Murrelet nests. It's a half-moon shaped D1 parcel that is between Icy Bay and Chugach Alaska lands on the west and NPS land on the east. It includes parts of the Malaspina Glacier. Kittlitz's Murrelets regularly nest in that area, and are a species of concern as a candidate for listing under the Endangered Species Act. Additional data on nest locations in that area are included in the two provided sources. NPS requests the BLM consider not revoking this parcel to maintain nesting habitat for the Kittlitz's Murrelets. Papers with nesting locations described: Kissling, M.L., S.M. Gende, S.B. Lewis, and P.M. Lukacs. 2015. Reproductive performance of Kittlitz's Murrelet in a glaciated landscape, Icy Bay, Alaska. The Condor: Ornithological Applications 117:237248. Kissling, M.L., P.M. Lukacs, J.J. Felis, G.W. Pendleton, S.M. Gende, and S.B. Lewis. In prep. Ecological correlates of reproduction for a bet-hedging seabird, the Kittlitz's murrelet. Marine Ornithology.	The Kittlitz's murrelet has no current ESA listing status, and the latest 12-month (2013) review concluded that it was not warranted to be listed; however, it is listed on the BLM's special status species list and is therefore included for analysis of impacts (see EIS Table 3.2-6, Bureau of Land Management Special Status Species by Guild).	N

Birds and Special Status Bird Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14831-2	Pamela Miller		I want to address the importance of those planning areas east of nearest to Fairbanks. And I know that the Denali Highway is a highly valued area around Fairbanks, and very important for migratory birds, as well as the whole ecosystem. Which, in our region, is changing so fast.	The importance of the East Alaska planning area to birds is described in EIS Section 3.2.1.1, Migratory Bird Habitat, Affected Environment, and EIS Table 3.2-1, Acres of High-Value Bird Habitat by Planning Area. The changing climate is addressed in EIS Section 3.2.1.1, Migratory Bird Habitat, Affected Environment, and EIS Section 3.2.1.2.7, Migratory Bird Habitat, Cumulative Impacts.	N
14842-7	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	Habitat loss (either by development or climate impacts) is a serious threat facing bird species across North America and Alaska. Migration routes are largely determined by food availability, and abundant food resources assist migrating birds to build and maintain adequate fat reserves needed to complete migration routes. Birds may not survive migration if habitat is degraded and food sources at an IBA stopover site are impacted. Foraging and staging areas along migration routes are now becoming limited by coastal and wetland developments and fragmentation... Rosenberg et al. (2016) recognizes the importance of understanding and addressing issues faced by migratory birds throughout their lives and during their full annual migratory cycles. Full life-cycle conservation of migratory birds requires actions that provide habitat and reduce mortality throughout the year and across their range (Spindler and Kessel 1980, Kessel 1998, BPIF Working Group 1999). Birds are declining everywhere; for many species, their last vestige is the reproductive refugia of Alaska. If destroyed, populations will have no opportunity to recover even if conservation improves at wintering habitats. The Service recommends the DEIS assess impacts to migratory birds in relation to their complete life cycle, including impacts to breeding, wintering, and migratory habitat. We also recommend revocations not overlap with any identified IBAs or BLM-identified important areas to ensure conservation.	Impacts to migratory birds, including breeding, wintering, and migratory habitat, is discussed in EIS Section 3.2.1, Available Migratory Bird Habitat. Information was added to Section 3.2.1.2.7, Cumulative Impacts, to address impacts to migratory birds and their full annual cycle under cumulative impacts. This EIS analysis analyzes "high-value bird habitats," which include habitats known to be frequently used for nesting or foraging or hunting during the breeding season, as stopover habitat during migration, or in winter by resident species. High-value bird habitat is retained under Alternative A.	Y
14842-8	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	McKay's Bunting: The entire global population of McKay's bunting breeds in Alaska and is estimated at 31,000 individuals (Matsuoka and Johnson 2008). This species winters along the Alaskan coastal areas of the Seward Peninsula, through the Yukon-Kuskokwim Delta, and south to the Alaska Peninsula (Montgomerie and Lyon 2011; Johnson et al. 2013). The Service is concerned wintering habitat on the mainland is not assessed for this species and recommends the BLM conduct an impact assessment to determine D1 revocation impacts to their winter range.	McKay's Bunting was added to the impacts analysis and to EIS Table 3.2-6.	Y
14842-15	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	The Bald and Golden Eagle Protection Act protects eagles from take, including disturbance anytime during the year, of individuals, nests, roosts, and foraging sites. The density of eagles (juveniles and breeding adults), especially golden eagles, within Alaska is highly variable statewide and varies by season (McIntyre et al. 2008). The Action area comprises many suitable habitats for both species.	Impacts to birds and special status bird species, including golden eagle and migratory bird habitat, are analyzed in EIS Section 3.2, Birds and Special Status Bird Species.	N

Climate					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10116-8	–	Alaska Wilderness League	In terms of Climate change, I see no robust analysis (or for that matter not much effort to introduce or analyze) of the current trends for future predictions for lands and waters in Alaska. Weather patterns are changing, permafrost is melting, animals, fish and vegetation is changing as well. The NOAA Arctic Report Card would be a simple place to access basic information to be incorporated into this analysis: https://arctic.noaa.gov/report-card/	As presented in EIS Section 3.3, Climate Change, additional discussion of climate change science and predicted impacts as well as the reasonably foreseeable and cumulative GHG emissions associated with the BLM's oil and gas decisions are included in the 2021 <i>BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends from Coal, Oil, and Gas Exploration and Development on the Federal Mineral Estate</i> (BLM 2022). This report presents the estimated emissions of GHGs attributable to fossil fuels produced on lands and mineral estates managed by the BLM. The 2021 annual GHG report is incorporated by reference as an integral part of the analysis (BLM 2022). The NOAA arctic report card is cited in EIS Section 3.15.4.1, Terrestrial Mammals, Affected Environment.	N
11513-1	Cailin McLennan		Please retain the D-1 protections on all 28 million acres in Alaska that are under review. With so many future uncertainties due to the climate crisis, it is very necessary to take a precautionary approach to public land management and preserve America's last natural places for generations to come.	The EIS analyzes a range of alternatives that allows for the Secretary to choose a precautionary approach. The Secretary of the Interior has the discretion to choose any combination of revocations of 17(d)(1) withdrawals within the analyzed range of alternatives.	N
11974-1	Elizabeth Donnelly		I urge you to retain the D-1 protections on all 28 million acres under review. With so many future uncertainties, it is more than good sense -- it is visionary to take a precautionary approach to public land management and PRESERVE our Nation's LAST BEST PLACES for generations to come.	See response to comment 11513-1.	N

Climate					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
12779-1	Roderick Flores		I am absolutely at a loss as to why BLM is even considering opening Alaska's BLM D-1 lands to new industrial activities. The arctic is already suffering from climate shifts that are currently four times worse than the lower latitudes and accelerating quickly. In fact, the non-linear response that the arctic has to massive injections of carbon dioxide into the atmosphere makes any assessments of additional industrial activities functionally impossible. The uncertainties would be so high that it is equally realistic to proclaim that the further fragmentation of these intact landscapes through new human activities of any sort will likely lead to the collapse of important mammal, bird, and fish populations. Pretending otherwise is pure hubris.	See response to comment 13379-5.	N
13134-1	Nanette Ippolito		Development of extractive industries in Alaska's climate would require 24-hours per day of burning of toxic fossil fuels for months @ a time to keep every engine from freezing up overnight. Industrial equipment tracking across pristine wilderness further accelerates melting of permafrost, which is setting off tectonic weight loss, & releasing trapped methane.	See response to comment 14641-39. Additionally, air quality is not included in the EIS because any development that takes place on any lands would have to follow Alaska regulations to limit pollutants and must meet the U.S. National Ambient Air Quality Standards and Alaska Ambient Air Quality Standards, as stated in EIS Table 1.6-2, Issues Identified but Eliminated from Detailed Analysis.	N
13933-2	Anonymous		Additionally the environmental consequences reached throughout the DEIS do not take into consideration the long term and cumulative effects of climate change exasperation through possible development. The climate change issue is only dealt with very summarily. There should be a significant analysis of all of the lands under consideration, not just the "focused analysis area", as to how development on that land would effect climate change, both in the future and cumulatively.	See response to comment 13379-5.	N
13953-1	Mary Waggener		In the "Fifth National Climate Assessment" report published in 2023, the introduction of the section on Alaska states, "Alaska is warming two to three times faster than the global average. The physical and ecological effects of warming are evident around the state. Glaciers are shrinking, permafrost is thawing, and sea ice is diminishing. The growing season is longer, and fish, mammals, birds, and insects have increased in numbers in some areas and dropped sharply in others. This combination of environmental effects has far-reaching consequences for people statewide. Following a brief description of distinctive characteristics of Alaska and an overview of recent climatology in this Introduction, the chapter emphasizes the societal implications of climate change for Alaska to a greater degree than in the corresponding chapters of previous National Climate Assessments (NCAs), with illustrative examples and recurring themes, such as salmon, governance, and adaptation." 9https://nca2023.globalchange.gov/chapter/29/)	See response to comment 10116-8.	N
14167-6	Olivia Karns	Tanana Chiefs Conference	<p>The current environmental review for the ANCSA (d)(1) lands was initiated, in part, because formerly prepared BLM RMPs are outdated with reference to current trends and analysis on climate change. Heightened climate threats to affected communities in the ANCSA (d)(1) lands project area is a universal concern among the rural Alaskan citizenry, Alaska Native organizations, resources staff among federal and state land managing agencies and the academic research community. The scientific literature on the current and future effects posed by accelerated climate change reveals extensive trends to communities in western and Interior Alaska. Studies have shown that the climate in the arctic and subarctic is warming between 2-4 times more rapidly compared to areas in the middle latitudes of North America. The accelerated trends in temperature, storminess and seasonal precipitation poses substantive threats to the infrastructure in permanent rural communities and the broader natural ecosystem. Variable factors for Interior Alaskan communities include a ecosystem already in decline by massive habitat changes resulting from more widespread wildland fires, landscape subsidence due to thawing of ice-rich permafrost, changes in water quality, large magnitude flooding, more intensive storminess, lateral channel migration due to bank erosion along inland river corridors and other related impacts across the biome.</p> <p>We reported in the scoping comments for the ANCSA (d)(1) environmental review that TCC participated in a climate change report issued by the Government Accountability Office, titled <i>Alaska Native Issues: Federal Agencies Could Enhance Support for Native Village Effort to Address Environmental Threats</i> (May 2022, GAO-22-104241). The preparers' of the report were interested in current threats and how agencies were, or were not, working well with Alaska Native communities. They were particularly interested in climate change issues throughout the riverine systems given the historic bias in climate studies on the coastal regions of Alaska. The relevance to the current ANCSA (d)(1) land review is that BLM can pause consideration of land disposals across the five resource management planning areas by recommending no action alternative to the Secretary of the Interior until further landscape health monitoring is implemented. Systematic ecological monitoring is needed on the biota across the broad land areas as a prerequisite to the derivation of adaptive management approaches to co-stewardship of those lands. Not until reportable results are available on the Gravel-to-Gravel salmon restoration initiative should BLM consider any type of land disposal from the ANCSA (d)(1) land domain.</p>	See response to comment 13379-5. Additionally, monitoring would be considered at the project-specific level when a specific project is evaluated under its own separate project-specific environmental review.	N

Climate					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14641-34	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS fails to adequately address the important function ANCSA 17(d)(1) lands have in protecting communities and critical resources against the effects of climate change. Federal lands in Alaska are estimated to store approximately 62% of the total carbon stored on all U.S. federal lands, which underpins the critical role these intact lands have in reducing the overall U.S. carbon balance.	See response to comment 6-1.	Y
14641-39	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Each of the alternatives fails to provide an analysis of direct, indirect, and cumulative effects of greenhouse gas emissions. Mineral leasing, mining, and exploration activities on ANCSA 17(d)(1) lands could cause significant greenhouse gas emissions (GHG) that contribute to the adverse effects on Alaska's lands and resources. The DEIS does not explain what impacts each of the alternatives have on GHG emissions, how the alternatives will mitigate those impacts, or how the alternatives would help meet or detract from achieving climate action goals or commitments. BLM simply asserts, "it is not possible to quantify the greenhouse gas (GHG) emissions that could occur to compare alternatives, this analysis relies on the assumption that development of leasable minerals is most likely to impact climate change." Although BLM claims the project would not be a direct source of GHG emissions, it makes no effort at providing any analysis to support this conclusion. BLM aptly noted that "indirect emissions occur as a consequence of the authorized action and can include activities such as the processing, transportation, and any end-use combustion of the fossil fuel mineral products," however it fails to analyze indirect emissions despite providing estimated emissions in other contexts. Similarly, there is no assessment of the degree of impact that is projected to occur from lifting ANCSA 17(d)(1) withdrawals in combination with the reasonably foreseeable future actions, in the context of a changing climate. Impacts from GHG emissions must be provided, especially since some resources such as summer Arctic sea ice and permafrost, which have wide-ranging climate impacts across the state, are approaching a tipping point, beyond which the damage will be irreversible. Further, given that we are already approaching a critical emissions ceiling, every action undertaken by BLM to allow extractive activities on public lands gains significance, as each action either pushes us toward dangerous emissions limits or maintains a similarly perilous trajectory. Additionally, maintaining protections for intact, connected landscapes is increasingly important to shield wild food economies, culture, and wildlife as climate change causes shifts in habitat use, changes in vegetation, and changes in subsistence practices.	As stated in EIS Section 3.3.1.2.2, Impacts Common to All Action Alternatives, any development would be subject to State of Alaska air quality permitting requirements and must meet air quality standards. Projects with a Federal nexus (such as Federal permits or funding) would undergo project-level environmental review and permitting, at which time, the project-specific amounts of GHGs would be calculated and disclosed.	N
14686-2	Brooke Woods, Melissa Shapiro	Permafrost Pathways at Woodwell Climate Research Center	Destruction of roads and essential infrastructure, such as utilities, homes, schools, and places of work that are underlain by permafrost interfere with income-earning opportunities and impose direct costs on local communities. Under moderate GHG emissions scenarios, 29% of roads, 23% of railroads, 11% of buildings across the Arctic will be affected by permafrost degradation; these percentages increase to 44%, 34% and 17% respectively, under high emissions scenarios. These impacts are estimated to impose \$5.5 billion in damage to critical infrastructure in Alaska by 2100, and contribute to cumulative damage of up to \$276 billion across the Arctic region by mid-century. For Alaska Native communities living most proximate to the D-1 lands in question, costs of repair and recovery due to permafrost thaw may be prohibitive and recurring. These costs are also far greater when ecosystem services and Indigenous Ways-of-Life are considered. Erosion and sedimentation from permafrost thaw can divert water courses, thereby compromising access to safe drinking water; disrupting subsistence fishing; ground subsidence and collapse affects use of traditional hunting grounds, caribou migration routes and breeding grounds; and shifts in species distributions or an increase in abundance of pests and pathogens may pose risks to both animal and human health. The integrity of these already fragile ecosystems cannot withstand the further disruption that mining operations and extractive activities threaten to impose should BLM lift the PLOs.	See response to comment 13997-1.	N
14702-25	Catherine Heroy	State of Alaska	Section 3.4.1.2.2 Impacts Common to All Action Alternatives. The document does not identify potential for carbon sequestration. There is potential for the State to create protected areas from development and turn them into carbon sinks helping to combat greenhouse gas emissions.	See response to comment 6-1. The State can move forward with any land use if lands are revoked and subsequently conveyed to the State. They may choose to use some lands as carbon sinks, but it is more likely that they will	N

Climate					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
				choose to pursue development on these parcels. Therefore, no assumptions were made in the analysis of any lands being set aside for conservation measures. This allowed for a conservative estimate of impacts, as all areas were assumed to be developed.	
3021-2	Haley Hoover		Lands can act as buffers against effects of climate change by maintaining resilient ecosystems. Preserving these lands is crucial for adapting and adapting to and mitigating the impacts of climate change on our renewable resources. Alaska's coastal communities are at the forefront of climate change enable industrial development in Done. Lands would only exacerbate the effects of climate change. That these communities are already experiencing industrial development and resource.	See response to comment 13379-5.	N
6-1	Lucile Brook		Something they don't mention is the tremendous value of these lands as a carbon sink. Surely this is an important factor to consider, since we have a rapidly heating planet that is threatening to all life on earth.	Thawing permafrost may dry out overlying soils, which may release trapped methane and GHG. The description of this impact was added in EIS Section 3.3.1.2.2, Impacts Common to All Action Alternatives. According to NOAA Barrow observatory's long-term records of carbon dioxide, thawing permafrost in the northern region of Alaska during early winter emits 70 percent more carbon dioxide today than in 1975 (Stein 2017). Alternatives with the greatest potential for development are assumed to contribute to larger GHG emissions from permafrost thawing and loss of potential carbon sequestration (as described in EIS Section 3.3.1.2.2, Impacts Common to All Action Alternatives).	Y
9888-1	Brock Peterson		Considering current climate change impacts and forecasted local/global impacts, the idea of opening up millions of acres of public land (in a climate sensitive region) for fossil fuel extraction is grossly irresponsible and shortsighted. The effects of these activities could be catastrophic, and even if not, they will at best continue to contribute to the climate crisis.	See response to comment 13379-5 and 11513-1.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13119-1	John Hester		I suggest the BLM officials should re-read the articles of Alaska statehood. The state was to manage its resources and lands, including federal lands within the state.	Section 4 of the Alaska Statehood Act recognizes the lands not granted to the State "shall be and remain under the absolute jurisdiction and control of the United States until disposed of under its authority, except to the extent as the Congress has prescribed or may hereafter prescribe." The analysis of the EIS recognizes the Federal control of the Federal lands.	N
14028-1	Noah Naylor	Northwest Arctic Borough	Northwest Arctic Borough Title 9 Zoning: The Borough's Zoning and Land Use Code (Title 9) identifies subsistence as the highest priority while economic development and resource extraction remain important goals.	The EIS analyzes a range of alternatives that include protecting Federal subsistence priority and economic development.	N
14127-2	Allan Chen		Alternative A is inconsistent with the intent of Congress that ANCSA Section 17(d)(1) not be a means to permanently close federal land from the operation of the US Land Laws or the US Mining and Mineral Leasing Laws.	ANCSA 17(d)(1) does not include an expiration date for the withdrawals. Instead, it states "the Secretary shall review the public lands in Alaska and determine whether any portion of these lands should be withdrawn under authority provided for in existing law to ensure that the public interest in these lands is properly protected. Any further withdrawal shall require an affirmative act by the Secretary under his existing authority, and the Secretary is authorized to classify or reclassify any lands so withdrawn and to open such lands to appropriation under the public land laws in accord with his classifications." As explained in the 1971 House Conference Report No. 92-746, this section "permit[s] the Secretary time to determine if there are other public land areas in Alaska which should be withdrawn, classified, or reclassified before they are opened to unlimited and uncontrolled entry, location and leasing under the public land laws . . ." Given this, Congress clearly contemplated that the withdrawals authorized under 17(d)(1) may lead to the land being withdrawn or classified in a way that removes the land from the operation of the mining laws indefinitely. The withdrawals established following enactment of ANCSA 17(d)(1) were made under the authority of 43 USC 141 (the Pickett Act), Executive Order 10355 (delegating the President's withdrawal authority to the Secretary of the Interior), and ANCSA 17(d)(1).	N
14579-2	Deantha Skibinski	Alaska Miners Association	Alternatives A, B and C do not meet BLM's Multiple Use mandate as it pertains to making BLM land available for mineral exploration and development. Alternative D is the only alternative that meets BLM's Multiple Use mandate established by the Federal Land Policy and Management Act of 1976 (FLPMA).	As described in EIS Section 1.5, Relationship to Statutes, Regulations, Other NEPA documents, all the alternatives comply with FLPMA. FLPMA did not repeal ANCSA, and its mandate does not supersede ANCSA. The FLPMA definition of multiple use recognizes "the use of some land for less than all of the resources" and the ability to withdraw lands for this purpose is provided within FLPMA. In this case, the lands are already withdrawn and FLPMA does not require the status to be changed.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14579-3	Deantha Skibinski	Alaska Miners Association	Alternative D is the only alternative that is consistent with the "proper balance" intent of the ANILCA, as laid out in ANILCA Section 101(d).	As described in Section 1.5, Relationship to Statutes, Regulations, Other NEPA documents, all alternatives comply with ANILCA. Section 101(d) lays out one of the purposes of ANILCA. It states that ANILCA provided the proper balance of "the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition." In enacting ANILCA, Congress did not revoke the 17(d)(1) withdrawals or remove the Secretary's authority to retain the withdrawals or to classify or reclassify the withdrawn lands.	N
14579-4	Deantha Skibinski	Alaska Miners Association	Alternative D is the only alternative that adheres to the intended 20-year limit for land withdrawals of greater than 5,000 acres, without Congressional approval as required by FLPMA Section 204 and to a similar limitation in ANILCA Section 1326(a).	These limitations are for new withdrawals, not for existing withdrawals. FLPMA 701 states "Nothing in this Act shall be construed as modifying, revoking, or changing any provision of the Alaska Native Claims Settlement Act (85 Stat. 688, as amended; 43 U.S.C. 1601 et seq.)." ANILCA 1326 refers to future withdrawals and does not restrict the withdrawals existing at that time or otherwise restrict the Secretary's ability to retain those withdrawals.	N
14579-6	Deantha Skibinski	Alaska Miners Association	The DEIS fails to consider the historical context of the 1972-73 d-1 withdrawals. Both ANCSA Section 17(d)(1) and ANCSA Section 17(d)(2) were passed prior to the FLPMA in 1976 and ANILCA in 1980. Congress passed FLPMA four years after the initial withdrawals were put in place. FLPMA requires BLM to prepare land use plans and includes numerous provisions to protect the public interest that meet the intent of the d-1 withdrawals. FLPMA also requires that withdrawals of over 5,000 acres of BLM lands be limited to twenty years unless approved by Congress. This is similar to language in ANILCA Section 1326(a). In both instances, the intent of Congress was that executive branch withdrawals, such as the ANCSA 17(d)(1) withdrawals, were limited in duration or size unless approved by Congress, yet these d-1 withdrawals have now been in place for more than FIFTY years.	See response to comment 14579-4. Neither FLPMA nor ANILCA created any restrictions on the length of time these withdrawals may stay in place. The withdrawals were already in place at the time FLPMA and ANILCA were enacted, and the limitations in those statutes relate only to future withdrawals.	N
14579-7	Deantha Skibinski	Alaska Miners Association	The DEIS completely ignores Section 207 of ALTAA and BLM's June 2006 report to Congress. ALTAA and the BLM's Report to Congress required by ALTAA Section 207 are NOT mentioned ANYWHERE in the DEIS, including in Section 1.5, Relationship to Statutes, Regulations and Other NEPA Documents. ALTAA is not referenced in Chapter 4, Literature Cited. Instead, the DEIS rewrites the history of the ANCSA 17(d)(1) withdrawals and subsequent conservation measures. Omitting any reference to ALTAA and the Section 207 report to Congress is an egregious error in the DEIS. Alternative D is the only alternative consistent with BLM's 2006 report to Congress that was required by Section 207 of ALTAA. In their 2006 report, BLM stated that decisions on ANCSA 17(d)(1) withdrawals would be made through BLM's RMP process. That report reiterates that these withdrawals, established in the early 1970s, were intended to be temporary, lasting only the duration of the land settlement process in Alaska. Eighteen years ago, BLM's ALTAA Section 207 report to Congress determined that the withdrawals were largely outdated and unnecessary. The following is from page 5, the Summary section of the Executive Summary of the "Report to Congress June 2006 Sec. 207 of the Alaska Land Transfer Acceleration Act": "The ANCSA withdrawals were intended to protect resources, to prevent encumbrances that could interfere with State or Native entitlements, and to study lands for further inclusion into conservation units. In the early 1970s when the lands were withdrawn under Section 17(d)(1) and (d)(2) of the ANCSA, there were few regulations to oversee the development of the public lands and protect important natural resources. Since then Congress has passed significant legislation for the orderly development of the public lands and to protect the environment from adverse impacts. The BLM has 1) developed extensive oil and gas lease stipulations, required operating procedures (ROPs), and surface management regulations for miners, which are now in place and sufficient to assess and protect the resources in most situations, 2) the selection period is over and the BLM is completing conveyance of State and Native entitlements, and 3) more than 102,097,900 acres have been withdrawn by ANILCA and incorporated into CSUs sufficient to protect those lands.	This comment is not substantive because it is not relevant to the environmental effects of revoking the withdrawals; rather, it relates only to the Department's authority to retain the withdrawals, questioning this authority in part based on past statements by the Department. The Department is not bound by the BLM's 2006 Report to Congress or any subsequent RMP recommendations. BLM. 2006. <i>Sec. 207 Alaska Land Transfer Acceleration Act. A Review of D-1 Withdrawals</i> . Report to Congress. June 2006. BLM/AK/AD-06/007+2355+932. Alaska State Office, Anchorage.	N
14579-8	Deantha Skibinski	Alaska Miners Association	A major flaw in BLM's DEIS is the failure to abide by decisions made in these RMPs. Alternative D is the only alternative presented that is reasonably consistent with these previous decisions. To adopt Alternatives A, B, or C, BLM would need to scrap or significantly revise all five RMPs, explaining why their previous data gathering and decision making were incorrect. This DEIS fails to indicate how Alternatives A, B, or C could be made congruent with existing Records of Decision that resulted from the RMP process. Each of those 5 RMPs was supported by an EIS that more completely addressed the potential impacts of various alternative actions regarding revocation of the (d)(1) withdrawals. Those five RMPs were subject to extensive public review, including public meetings in numerous communities. The DEIS fails to explain why the decisions made in the 5 RMPs should be changed. These plans have approved Records of Decisions (RODs). BLM has already evaluated the impacts of the revocation of the (d)(1) withdrawals in five RMPs and their associated EISs.	EIS Section 1.2, Background, explains why the BLM is re-evaluating the recommendations made in the RMPs. Section 1.3, Purpose and Need for Action, describes why the EIS is necessary. See response to comment 14579-7.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14581-1	Becky Long		<p>The D-1 lands need to align with the area's state management plans that the public invested much time and energy to create and pass.</p> <p>* The D-1 lands are north of the Talkeetna Mountain Region of the Susitna-Matanuska Area Plan adopted August 2011 by the Division of Mining, Land and Water, Alaska Department of Natural Resources. Subunit T-01 has designations/classification of Habitat/Wildlife Habitat Land and Water Resources/Water Resources Land. Subunit T-02 is designated Habitat and Recreation Public Dispersed/Public Recreation Land. Subunit L-03 is the state Legislatively Designated area Nelchina Public Use Area.</p> <p>"Most of the region's resources are related to its wildlife and its associated habitat. Significant moose calving, and winter concentration areas occur within the Talkeetna foothills, while Dall sheep are present throughout much of the remainder of the unit and especially those areas that are exposed and provide escape terrain from predators. Both winter and summer caribou concentration areas occur near and east of the Talkeetna River. The prime caribou calving areas occur, however, further to the east within the Nelchina Public Use Area. All of the principal streams are anadromous. With the presence of significant game populations and adjacent populated areas, this is one of the most heavily used big game hunting areas in the state, offering moose, Dall sheep, bear, and caribou." (pg. 3-114)</p> <p>"Most state land will be managed in a manner similar to that inferred from its designation, which means that most will be managed for its wildlife habitat, water resource, and public recreation values." (pg. 3-115)</p> <p>* Susitna Basin Recreation Rivers Management Plan adopted August 1991 and currently under revision is an important state management plan that personifies the important resources of this general area that the public wants to protect. It is also an Alaska Department of Natural Resources managed plan. 44.5 miles of the Talkeetna River including the upper Talkeetna River Canyon is a state legislatively designated Recreation River. The river and its recreation river corridors within which are riparian management areas are managed for high public use values. These are public ownership and use, recreation, fish and wildlife habitat, water quality and water flow.</p> <p>* Retaining D-1 protections are compatible with these plans.</p>	See response to comment 14702-12. While the EIS considers the State's management plans, the Secretary is not bound by the State's decisions. The decision of how these lands should be managed is a Federal decision.	N
14641-58	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLMs central purpose in this process is to determine whether opening these lands would be consistent with the purposes of ANCSA 17(d)(1), which requires protection of the public interest, including factors such as subsistence hunting and fishing, habitat connectivity, protection of cultural resources, and protection of threatened and endangered species.14 ... lifting the withdrawals could result in intensive development and impacts associated with mining or extraction activity15 ... these activities threaten terrestrial mammals, birds, fish, and other important natural resources which are integral to subsistence communities and cultures across the state. ... The DEIS therefore clearly demonstrates that lifting the withdrawals would be contrary to the strong public interest in protecting fish, wildlife and biodiversity, and subsistence resources and users. ... BLMs selection of any of the action alternatives has the potential to violate its statutory obligation to protect the public interest	The EIS informs the Secretary of the impacts that may result if the Secretary revokes the withdrawals. From this information, the Secretary can make a determination of whether the withdrawals continue to be necessary to ensure the protection of the public interest.	N
14641-59	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	While BLM attempted to minimize impacts to subsistence use areas under Alternative B, it found such impacts could not be entirely avoided. In light of the widespread harm to subsistence anticipated to occur under each of the action alternatives and the absence of any legal obligation or compelling need to lift the withdrawals, it would likely be challenging or impossible for BLM to defend its choice of one of these options as being compliant with ANILCA 810. In particular, BLM would struggle to demonstrate that lifting the withdrawals is necessary for the sound management of public lands to such a degree that it outweighs the expected large-scale harms to subsistence. BLM would also have difficulty demonstrating that the adverse effects to subsistence are minimized and that its decision involves the minimal amount of public lands needed to fulfill the purpose of the action when its Purpose and Need statement makes no mention of any specified objective.	See response to comment 14579-3. ANILCA 810 provides a balancing test for the decision-maker to consider before taking any action that would impact particular aspects of subsistence. It specifically allows a significant restriction of subsistence uses when it 1) is necessary, 2) involves the minimal amount of public lands necessary to accomplish the purpose, and 3) the agency has taken reasonable steps to minimize the adverse impacts.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14641-60	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	In addition, this Administration has reaffirmed its commitment to meeting its trust responsibility to Tribes, including by taking subsistence needs into account in federal land management decisions. Adopting an action alternative that would pose a significant and unnecessary threat to subsistence is inconsistent with this Administration's stated policies.	See response to comment 14641-58. The final EIS fully informs the Secretary of potential impacts to subsistence, and the Secretary will consider the detailed analysis when deciding whether to revoke or retain these withdrawals, in whole or in part.	N
14651-1	Tim Gilbert	Maniilaq Association	Maniilaq has significant concerns with the proposed actions of revoking 17(d)(1) withdrawals under Alternative B, Alternative C, and Alternative D that seems to prioritize lifting the withdrawals in a blanket policy to apply across Alaska and to allow the State of Alaska ("State") to complete its "top filings" pursuant to Alaska National Interest Conservation Lands Act (ANILCA) 906(e). Prioritizing the revocation of close to 28 million acres of 17(d)(1) withdrawals for the purposes of completing the status of the State's top filings does not seem to fulfill the purposes of ANCSA, the very law under which the withdrawals occurred.	See response to comment 14651-8.	N
14702-4	Catherine Heroy	State of Alaska	Retention of the 17(d)(1) withdrawals violates BLM's policy in its 2006 Report to Congress on the 2004 Alaska Land Transfer Acceleration Act and is inconsistent with operative BLM Alaska RMPs. Revoking the ANCSA Sec. 17(d)(1) withdrawals is long overdue, and Congress acknowledged this in 2004 with the Alaska Transfer Acceleration Act (ALTAA). In enacting the 2004 ALTAA, Congress prescribed a process to expedite settling the complex process by which the State and ANCSA corporations fulfilled their land entitlements. Section 207 of the Act directed BLM to review the (d)(1) withdrawals and report to Congress on whether any of them could be opened to entry. BLM concluded that many had fulfilled their purpose and recommended lifting them through BLM's land use planning process:	See response to comment 14579-7.	N
14702-5	Catherine Heroy	State of Alaska	This and the more stringent requirements for managing development under State and federal laws, regulations, and plans, means the original protections from the (d)(1) withdrawals are no longer critical for the protection of the public's interest. The (d)(1) withdrawals are an unnecessary encumbrance on the public land records complicating interpretation of the title record and allowable entries on public lands by the public.	Revocations could result in the loss of Federal subsistence priority (see EIS Section 3.14, Subsistence) due to opening lands to selections under the Statehood Act and the loss of access and reduction in abundance from opening lands to mineral entry; only the continued withdrawal of the land could prevent impacts to Federal subsistence priority from the Statehood Act and from mineral entry.	N
14702-6	Catherine Heroy	State of Alaska	As BLM itself states in the 2006 Report to Congress, many of the withdrawals on BLM lands in Alaska have "outlived their purpose," are an "unnecessary encumbrance on the public land records complicating interpretation of the title record by the public," and "are no longer critical for the protection of the public's interest." The State notes that since issuing the report, the lifting of these 17(d)(1) ANCSA withdrawals were evaluated in these five RMPs in Alaska: Bay, Ring of Fire, Bering Sea-Western Interior, Kobuk-Seward, and East Alaska. These plans followed the recommendations of the Report and recommend lifting the vast majority of ANCSA withdrawals, allowing for mineral exploration and development in accordance with existing federal regulations, operating procedures, and mining laws. In determining whether the 17(d)(1) withdrawals were needed to protect the public interest in the lands, BLM gave full consideration to the opportunity to achieve better management of federal lands, and to meet the needs of state and local residents and their economies through a public involvement process and resource analysis.	See response to comment 14579-7.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14702-14	Catherine Heroy	State of Alaska	<p>ANILCA Section 101(d) is clear on Congressional intent that no further legislation or regulation designating new conservation system units, national recreation areas, or national conservation areas are warranted because ANILCA struck a proper balance between protection of the national interest in the public lands in Alaska and the future economic and social needs of the State of Alaska and its citizens. ANILCA fulfilled the purposes of the ANCSA (d)(1) and (d)(2) temporary withdrawals to ensure the public interest in these lands is properly protected through conservation system units.</p> <p>Congress reaffirmed the belief of management balance in ANILCA Section 1326. Section 1326 limits the power of the Executive Branch to use its authority to upset that proper balance. Section 1326 provides clear and unambiguous restrictions on future executive branch actions with respect to future withdrawals and further studies or reviews without Congressional approval. Inclusion of this language was not unintentional, nor was it done without considerable effort. These "no more clauses" in ANILCA were critical to striking the necessary balance for ANILCA's successful passage.</p> <p>As part of that balance, Congress left a substantial amount of federal lands in Alaska that are not designated for conservation purposes and identified these lands as appropriate for use and development. These lands are managed by the BLM, the United States Forest Service, the Department of Defense, and the Federal Aviation Administration. BLM lands, "lands necessary and appropriate for more intensive use and disposition," are managed for multiple use under the Federal Land Policy and Management Act of 1976 (FLPMA). With FLPMA, Congress ensured that its multiple use mandate would prevail "unless otherwise specified by law." The BLM will upset this intended balance and disregard their multiple use mandate if they do not revoke these withdrawals and manage the land for multiple uses such as hunting, fishing, trapping, and other traditional activities. We request that the BLM revoke these withdrawals to maintain the proper balance Congress struck in ANILCA.</p>	See response to comment 14579-2 and 14579-3.	N
14702-15	Catherine Heroy	State of Alaska	<p>Congress also balanced the existing land uses with national policies in ANILCA by providing for access to and the continuation of traditional activities on federal lands, Sections 1110, 1111, and 811 of ANILCA provide for access to these federal lands for transportation and utility right of ways, aircraft landings, snowmachines, off-road vehicle use, and hunting, fishing, and trapping activities that are not allowed on federal lands elsewhere in the nation. Even within Alaska CSUs, Congress provided provisions for mining and oil and gas development activities. General BLM lands should not be managed more restrictively than Conservation System Units. The BLM needs to include the impacts maintaining the withdrawals will have on the State's ability to meet its economic and social needs as well as those needs of its people with the loss of these provisions in the final EIS.</p>	ANILCA 1323(b) provides a similar access provision as those in ANILCA 1110, 1111, and 811, but it applies to access on BLM-managed lands, including those withdrawn, and ensures that access on BLM-managed lands is not more restrictive than on conservation system units.	N
14702-16	Catherine Heroy	State of Alaska	<p>FLPMA withdrawals</p> <p>BLM also fails to address Congressional direction at 43 U.S.C. 1714(f) which states: the withdrawal period may be extended or further extended only upon compliance with the provisions of subsection (c)(1) or (d) of this section, whichever is applicable, and only if the Secretary determines that the purpose for which the withdrawal was first made requires the extension, and then only for a period no longer than the length of the original withdrawal period. The Secretary shall report on such review and extensions to the Committee on Natural Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate.</p>	The subject withdrawals were not established pursuant to FLPMA and do not have an expiration date that would require the Secretary to consider whether to extend the withdrawal pursuant to 43 USC 1714(f). Therefore, this consideration is not necessary in the EIS.	N
14702-17	Catherine Heroy	State of Alaska	<p>DNR requests the BLM consult with State area plans and consider the impact of the proposed action on state area plans. BLM can work with DNR's Resource Assessment & Development Section to ensure consistency.</p>	The management of the Federal lands is not subject to the State area plans. However, the State's area plans were considered in the development of the EIS. See also response to comment 14581-1.	N
55-1	Cheryl Spink		<p>If I am to understand that any portion of the land in question was given to the shareholders in the Calista Corporation, as part of the Alaska Native Claims Settlement Act (ANCSA) and that they own the subsurface rights to the proposed land, then I believe our state and federal government have to honor that. Until the Calista Corporation and Alaska Native people involved give their permission for the use of their legally given land, then I am vehemently opposed to any legislation that changes the agreement that was made as part of ANCSA.</p>	See response to comment 14052-3. The project does not change the uses allowed on lands conveyed to the Calista Corporation.	N

Compliance with Other Laws					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
9988-2	Austin Ahmasuk	Native Movement	<p>...you mentioned several times that the action alternatives won't impact Native corporation lands... And I believe the term you used was the -- the federal -- the federal lands are segregated from the Native corporation lands, right?</p> <p>So they might be legally segregated, but in practice the craziness that Chief Harris [as spoken] was talking about, is that a man -- when -- when lands are opened to mineral entry miners will sneak over onto lands they don't own, and this is a well known fact.</p> <p>In the 5,000 or so APMAs in -- just across Alaska in the annual affidavits of labor, these miners, in their annual affidavits of labor, claimed, without -- without any sort of hesitation, that they steal minerals from Native corporation lands. And so when -- when you say that there's legal segregation, in practice there isn't really any segregation because these miners steal lands from Native corporation -- Native corporation lands.</p> <p>And so I'm -- my -- my question to you is, why would you -- why would you characterize it in such a way? You know this is going on for -- for decades... So what -- what's the -- I mean, what's the intent of characterizing it in such a way?</p>	See response to comments 14641-20 and 13984-7.	N
9990-3	Jessica Winnestaffer		<p>I just would like, for the record, to make sure, just in case it doesn't come over from the question/answer, that there is some consideration to documenting the social system impacts of theft on ANCSA lands and other private lands, because as we heard earlier, there's good example of that. And it should be one of those hypothetical plausible scenarios, and it should be part of your presentation. And the health impact analysis process evaluates pros and cons. And while I think there have been some good jobs of evaluating pros and cons, the language that was highlighted in the question/answer about likely beneficial economic impacts has a con as well, and there are likely bene -- likely very negative social impacts. And so I think it's really dangerous to only highlight one side. And generally health impact analysis looks at both sides of every situation. So that's it.</p>	See response to comment 13984-7. The analysis of the economic and social impacts in the EIS captures both the potential positive and negative impacts from the actions.	N
9994-1	Casey Cusick	Ahtna Intertribal Resource Commission	<p>So in terms of ANILCA Title VIII, Section 804, preference for subsistence, how would revoking subsistence use areas, granting them to the state, and ultimately state hunting regulations be put in place, which would be nonfederally qualified users hunting those lands with no subsistence priority, how is that not protected under ANILCA?</p>	See response to comment 14579-3. Section 810 of ANILCA provides the review which an agency must conduct if it proposes an action that significantly restrict subsistence uses.	N

Agency Consultation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14023-2	Derrick Wilkerson, Charles Dodge	Federal Aviation Administration; Federal Aviation Administration	<p>At this time, BLM has not provided enough information for the FAA to determine the impacts of BLM's proposed revocation action to FAA site specific withdrawals or to other potentially impacted airports or navigational aids properties. Those impacts might occur with or without FAA consent. As to an upcoming BLM request to provide consent, making an appropriate determination about whether to consent may not be possible without additional discussion in the DEIS.</p>	The Secretary recognizes that under FLPMA 204(j), the Secretary cannot revoke a withdrawal of lands under the administration of any department or agency other than the Department of the Interior without the consent of that department or agency.	N

Cultural Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10384-1	Marce Simeon	Native Village of Tazlina	<p>There are 264,336 acres of federal subsistence land in the Eastern Region planning area (which is where we are located in the EIS organization) that would lose that status under Alternatives B, C, or D. These areas are prime hunting land for Ahtna people that would no longer be under federal management but would instead revert to State management, open to all Alaskans.</p> <p>The cultural resources that are on these withdrawn lands are currently under federal management. Federal historic preservation laws/regulations are stricter. Under Alternatives B, C, or D, cultural resources would fall to State of Alaska management. Their laws/regulations are much less protective. We don't feel the cultural resources would be responsibly managed under State law.</p>	Loss of Federal regulatory protection and the potential impacts resulting from that loss are discussed in EIS Section 3.4.1.2.2, Loss of Federal Regulatory Protection. The BLM is writing a PA to comply with the Section 106 of the NHPA for the project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the decision area, and takes their comments into account.	N

Cultural Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13368-2	Lisa Ellanna	Kawerak, Inc.	Indigenous Peoples of Alaska have been a part of their lands for millennia, and the lands contain countless sacred sites, burial grounds, ancient communities, camps, Traditional Cultural Places, and Cultural Landscapes. In development of the DEIS, the Bureau relied on the Alaska Heritage Resources Survey (AHRs) while considering Cultural Resources, however it must be noted that the AHRs does not take intangible and landscape cultural resources into account and does not adequately consider the multitude of cultural resources known to Alaska Native communities. Kawerak strongly urges the Bureau to expand on AHRs data through entering into meaningful consultation with Tribes which would allow those Traditional Knowledges and expertise to become incorporated into the final EIS. Kawerak is very concerned that all action alternatives presented in the DEIS could have devastating impacts on cultural resources. If withdrawals are lifted, so too are the federal regulatory protections. The State of Alaska's Historic Preservation Act does not provide formal means for Tribes to enter into consultation regarding protection of cultural resources. When considering the potential impacts of lifting ANCSA 17(d)(1) withdrawals, the Bureau must take a "hard look" regarding whether lifting withdrawals will place cultural resources at risk. A thorough analysis of cultural resources located within 17(d)(1) withdrawal lands and any potential impacts to those cultural resources are qualifying factors that necessitate federal withdrawals be retained. We expect the Bureau to take the strongest action possible to protect our irreplaceable cultural resources and cultural heritage, and that is adopting the 'No Action' alternative.	Information gained through consultation with Tribes was added to the list of data used in EIS Section 3.4.1.1, Cultural Resources, Affected Environment. Additional text recognizing that Indigenous Peoples of Alaska have been a part of their lands for millennia, and that the lands contain countless sacred sites, burial grounds, ancient communities, camps, traditional cultural places, and cultural landscapes, has been added to EIS Section 3.4.1.1.5, Kobuk-Seward Peninsula Planning Area. In addition, the BLM has initiated the development of a PA, which includes consultation with Tribes and opportunities to identify cultural resources that are important to Tribes. The PA will evaluate the impacts and potential mitigation measures to those impacts. Section 106 consultation invitation letters were sent to Tribes and ANCs on 8/22/2022 and 11/16/2022. Tribes and ANCs, along with other consulting parties, that indicated their interest in participating in the Section 106 of the NHPA process, either in response to the above letters or via other consultation or public scoping, were sent a letter along with a template PA, on 1/25/2024, and invited to a virtual Section 106 consulting party meeting on 2/15/2024. Information on how to participate in the Section 106 process has also been posted on the ePlanning website for the project.	Y
13445-2	Richard Slats		Across the Yukon-Kuskokwim Delta our fishing and hunting practices and ceremonies are essential to the social, cultural, spiritual, and economic well-being and survival of our people and traditions. Tribes and others have participated in BLM land use planning processes, nominating watersheds and landscapes for protection. We reiterate here the importance of the Yukon-Kuskokwim Delta lands and resources and urge BLM to consider the real and probable adverse impact that lifting D-1 protections will have on our people. Lifting D-1 protections would fragment important habitat, jeopardize access to subsistence resources and could turn the Yukon-Kuskokwim region into a mining district.	The importance of fishing and hunting practices and ceremonies as essential to the social, cultural, spiritual, and economic wellbeing and survival of Yukon-Kuskokwim Delta people and traditions is discussed in the Increase in Lands Open to Development section in EIS Section 3.4.1.2.2, Impacts Common to All Action Alternatives. See also response to comment 13870-2.	N
13790-3	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	The cultural resources embedded in these lands are of immense historical and archaeological significance. They offer invaluable insights into our past and are a source of pride and identity for Alaska Natives. The removal of the 17(d)(1) designation risks exposing these irreplaceable resources to potential damage or destruction.	See response to comment 13870-2.	N
13870-2	Megan Condon	Bering Sea-Interior Tribal Commission	Cultural Resources and National Historic Preservation Act Section 106 Process. The Bureau must take a "hard look" at potential impacts of lifting d-1 withdrawals to cultural resources. Lifting d-1 withdrawals places cultural resources within those lands at jeopardy. Thus, comprehensive identification of cultural resources within lands subject to d-1 withdrawals and analysis of potential impacts is essential to ensuring existing protections for cultural resources remain in place. In the Draft EIS, the Bureau recognized the limited information available to the agency about cultural resources in the relevant planning areas. During scoping, the Tribal Commission encouraged the Bureau to avoid relying solely on archaeological surveys and research to identify and analyze impacts to cultural resources. In past analysis, the Bureau's reliance on Alaska Heritage Resources Survey (AHRs) data has resulted in a focus on discrete sites and a failure to consider intangible and landscape-level cultural resources, such as Traditional Cultural Places and Cultural Landscapes. Though we appreciate the Bureau's efforts to include "culturally valued places" that are not limited to discrete sites, the analysis in the Draft EIS is still largely based on information from the AHRs. Data from the AHRs substantially underrepresent the number of cultural resources within the planning areas and demonstrate a significant bias in favor of archeological resources. The incomplete information and reliance on the AHRs underscore the importance of incorporating Tribal expertise and Traditional Knowledge to ensure Tribes' cultural resources are adequately considered and protected. To that end, the Draft EISs inclusion of Indigenous place names, Tribes' ACEC nominations, and scoping comments are good first steps. The Tribal Commission strongly encourages the Bureau to go beyond these isolated references and incorporate Tribal expertise and Traditional Knowledge more fully in the Final EIS. This should include consulting with Tribes in the application of their knowledge and explicitly identifying how the Bureau's final decision incorporates Tribal expertise and Traditional Knowledge.	The BLM is writing a PA to comply with the Section 106 of the NHPA for the project. The PA will include how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, the State, ANCs, local governments, and other organizations with knowledge of cultural resources in the decision area, and takes their comments into account. If Tribes have Indigenous knowledge that can inform the analysis, that data are welcomed and will be review for inclusion in the NEPA and/or Section 106 process and documents.	N
13930-1	Sandy Packo		I have reviewed the proposed changes and am concerned that the impact studies to date do not comprehensively represent the cultural and environmental impacts that would take place if these lands are stripped of their ANCSA 17(d)(1) status protections. Any cultural and environmental studies completed have likely been measured using Western methodologies. They cannot fully convey the cultural impacts without advisement from Indigenous perspectives and participation from the surrounding communities in those regions. Alaska Native Ways of Knowing and Being are not reflected, considered or made space for in these studies. Therefore, the measures of cultural	See response to comment 13870-2.	N

Cultural Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			impact currently identified cannot be fully validated. It would be cultural genocide to revoke the federal subsistence rights of those lands without understanding of the true cultural costs that would be incurred by a decision to revoke the 17(d)(1) status protections of those parcels of land.		
13984-1	Chief Gary Harrison	Chickaloon Native Village	<p>The EIS describes inherent uncertainties and assumptions involved in analyzing the potential impacts of revoking 17(d)(1) withdrawals. Considering how large the decision area is, nearly 28 million acres, these uncertainties can have significant impacts on Indigenous peoples in several ways.</p> <p>Indigenous communities have ancestral ties to the territories and there are sacred sites within the decision area. Because the EIS could not possibly have examined every one of those sites or territories it makes difficult to assess how Indigenous lands and resources may be affected. This uncertainty is stressful within Indigenous communities, who rely on these lands for cultural practices, subsistence activities, and spiritual connection.</p>	See response to comment 13870-2	N
13984-3	Chief Gary Harrison	Chickaloon Native Village	<p>The BLM is correct that indigenous placenames could provide valuable insight into cultural resource impacts. However, placenames have not been fully categorized. Placenames, especially those of Indigenous origin, represent a rich tapestry of cultural, historical, and geographical significance. Because Indigenous placenames have not been systematically recorded or recognized this leaves a tremendous gap in insight. Colonial authorities or early settlers often established non-Indigenous placenames that have become in common usage. As a result, many Indigenous placenames may still remain undocumented or under-documented, particularly in regions where Indigenous languages and cultures have faced suppression or marginalization.</p> <p>The meanings and significance of Indigenous placenames can vary depending on local cultural context or oral traditions and different groups may have different names for the same place. This variability makes it challenging to fully categorize and interpret all place names within a given area. The meaning of Indigenous placenames may be deeply intertwined with spiritual beliefs, ancestral connections, and oral histories, adding layers of complexity to their interpretation.</p> <p>The process of categorizing placenames often involves imposing non-Indigenous frameworks and classifications onto Indigenous cultural practices, which may not fully capture the nuanced meanings and relationships embedded within these names. Indigenous communities themselves are often the most knowledgeable sources for interpreting and preserving the significance of their placenames.</p>	<p>Despite the concerns noted in the comment, the cultural resource datasets used in EIS Section 3.4, Cultural Resources, are still valuable pieces of information that can help the Secretary make a reasoned choice among alternatives.</p> <p>The BLM acknowledges that its knowledge of the cultural resources within the decision area is not comprehensive, which is one of the reasons that consultation during both the NEPA and Section 106 process is so critical to the analysis and decision-making process. See also response to comment 13870-2.</p>	N
13984-4	Chief Gary Harrison	Chickaloon Native Village	<p>The revocation of 17(d)(1) withdrawals has the potential to inflict significant damage on cultural resources, with impacts extending many generations up to and including total loss. The loss of Federal regulatory safeguards could render cultural resources vulnerable, especially if the land is transferred out of Federal ownership. This could expose these resources to exploitation, neglect, or even destruction, without the necessary oversight and preservation efforts mandated by Federal regulations. The revocation of these withdrawals opens the door to development activities and infrastructure projects on those lands. Potential development could pose immediate and direct threats to cultural resources, including archaeological sites, sacred areas, and culturally significant landscapes. The construction of roads, buildings, or industrial facilities may irreversibly alter or destroy these resources, erasing the ancestral connections to Indigenous histories, traditions, and identities. The potential impacts of development on cultural resources is made even more complicated because of the sheer scale of land affected.</p> <p>The revocation of 17(d)(1) withdrawals not only threatens the regulatory protection of cultural resources but also exposes them to the risks associated with unrestricted development. This poses a grave risk of irreparable loss, not only to the physical manifestations of Indigenous culture but also to the intangible heritage and identity embedded within these landscapes.</p>	Impacts from loss of Federal regulatory safeguards and to potential development activities are discussed in the Loss of Federal Regulatory Protection and Increase in Lands Open to Development sections in EIS Section 3.4.1.2.2. See also response to comment 13870-2.	N
14167-9	Olivia Karns	Tanana Chiefs Conference	<p>The subject of cultural resources is broad and complicated with regard to the current ANCSA (d)(1) lands review. The expansive scope of uncertainties give further support for the <i>no action</i> alternative. The analysis of cultural resources includes sources of data from the Alaska Heritage Resources Survey (AHRS, a state-wide database on recorded heritage sites in Alaska), a recently published extensive manifest of Alaska Native ethnographic place-names, and an inventory of ANCSA 14(h)(1) historical places and cemetery sites. Most striking among these data are frequencies of reported cultural resources among the five planning areas, a tally of 9,008 recorded AHRS heritage sites, traditional trails, place names and other identified cultural resources. Of that total, none would be adversely affected by Alternative A (the no action alternative), 1,982 by Alternative B, 5,653 by Alternative C and all 9,008 by Alternative D. Among this class of cultural resources, very few have been evaluated for the National Register of Historic Places. A large percentage of those cultural resources may be eligible for the National Register of Historic Places and be adversely affected by all of the action alternatives. Specific to the ANCSA 14(h)(1) sites, those</p>	See response to comment 13984-3.	N

Cultural Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>certified as eligible by the Bureau of Indian Affairs are also presumed to be eligible for the National Register of Historic Places.</p> <p>Several other factors are relevant in order to more broadly understand the potential effects on cultural resources posed by the ANCSA (d)(1) land decision. The cultural resources section admits that a full inventory of cultural resources on ANCSA 17(d)(1) lands is impractical given the extent of the land base and agency staffing. Among federal agencies, cultural resources programs are usually highly underfunded, and this is the case with the BLM cultural resources staffing in Alaska. Adding to staffing challenges, within the cultural resources profession, it is broadly understood that the AHRs database grossly underestimates the full range of cultural resources across any particular terrestrial landscape. This observation is supported by the comparatively large number of ethnographic place-names reported for each planning area compared to the number of cultural resources recorded in the AHRs. Alaska Native place-names are typically geographically based and are tied to landscapes and cultural features linked to travel or hunting routes where habitation sites may exist.</p>		
14167-10	Olivia Karns	Tanana Chiefs Conference	<p>The project proposes to develop a cultural resources programmatic agreement that would guide management of the diverse portfolio of cultural, ethnographic and archaeological resources. The programmatic agreement should acknowledge lands important to Tribes with an appropriate classification scheme, such as an ACEC or area of cultural concern and establish a set of protocols to work with Tribes to conduct inventories and evaluations of cultural resources (Section 110 and 106 requirements of the National Historic Preservation Act). As currently proposed, the Public Lands rule-making process would allow the BLM to designate lands important to Tribes for subsistence purposes as ACECs. Such a land designation will facilitate an inventory of the constellation of traditional land-use areas and associated cultural resources that conform to the National Historic Preservation Act (NHPA).</p>	See response to comment 13870-2.	N
14167-11	Olivia Karns	Tanana Chiefs Conference	<p>The loss of federal oversight on cultural resources within ANCSA (d)(1) lands that are proposed in all three of the action alternatives poses substantive adverse effects to cultural resources across the five planning areas. The analysis states that the agency prefers to avoid affects to cultural resources, but all of the action alternatives pose unavoidable significant effects to cultural resources. Tribal consultation requirements routinely exercised by federal agencies under the NHPA would be relaxed if lands are transferred to the State of Alaska. The change in Tribal consultation requirements would be a disservice to affected Tribal governments in their traditional-use areas. Stated more directly, the State of Alaska has given away significant cultural resources such as archaeological sites without mitigation throughout the Land for Alaskans program for decades. Retaining federal oversight would provide a higher level of care toward the management of cultural resources and preserve the consultation process with Tribes. Without formal inventory and evaluation, the transfer of historic properties out of federal control would be a major omission with respect to the NHP A. On a related land transfer subject, there is reference to the potential effects the Vietnam Veteran allotment selections would have on cultural resources. Those lands would be managed as restricted Indian lands with federal trust oversight by the Bureau of Indian Affairs, and the BIA would retain the NHPA responsibilities.</p>	Loss of Federal regulatory protection and the potential impacts resulting from that loss are discussed in the Loss of Federal Regulatory Protection section in EIS Section 3.4.1.2.2. See also response to comment 13870-2.	N
14167-12	Olivia Karns	Tanana Chiefs Conference	<p>A conclusion in the analysis on page 3-20 states that the no action alternative would continue affecting cultural resources by erosion, thawing of permafrost, development, and other land processes, but this is false since the retention of PLOs would preserve federal oversight by engaging agency policies and procedures over land and resource management. For example, under a future development project, the BLM would retain the NHP A, Section 106 process, among other permitting requirements. The action alternatives would reduce or eliminate federal oversight on the affects to cultural resources by erosion, wildland fires, development and other environmental threats.</p>	While potential impacts to cultural resources would be fewer, the No Action Alternative could still impact cultural resources. While the withdrawals would remain in place under the No Action Alternative, not all land covered by the withdrawals would be transferred out of Federal ownership under any action alternative. Even when withdrawals are lifted, the NHPA Section 106 process would still apply to all Federal lands for most potential future actions.	N
14267-5	Grace Singh, Tim Gilbert	Maniilaq Association	<p>An important federal mechanism to protect traditional and sacred sites is through the National Historic Preservation Act (NHPA), the application of which would be significantly and adversely affected in Alternatives B-D. The loss of federal oversight on cultural resources within ANCSA (d)(1) lands that are proposed in Alternatives B-D poses substantive adverse effects to cultural resources across the five planning areas. The DEIS analysis states that the agency prefers to avoid affects to cultural resources, while Alternatives B-D all pose unavoidable significant effects to cultural resources. The expansive scope of uncertainties within all of the Alternatives provides further support for the no action alternative.</p> <p>The analysis of cultural resources includes sources of data from the Alaska Heritage Resources Survey (AHRs) a recently published extensive manifest of ethnographic place-names and an inventory of ANCSA 14(h)(1) historical places and cemetery sites. Due to significant understaffing, it is broadly understood that the AHRs database grossly underestimates the full range of cultural</p>	See response to comment 13870-2. Loss of Federal regulatory protection and the potential impacts resulting from that loss are discussed in the Loss of Federal Regulatory Protection section in EIS Section 3.4.1.2.2	N

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			resources across any particular terrestrial landscape. The cultural resources section of the DEIS admits that a full inventory of cultural resources on ANCSA 17(d)(1) lands is impractical given the extent of the land base and agency staffing. This observation is supported by the comparatively large number of ethnographic place-names reported for each planning area compared to the number of cultural resources sites recorded in the AHRS. Native place names are typically geographically based and tied to a landscape or cultural feature linked to travel or hunting routes where habitation sites may exist. Further, the AHRS database shows numerous reported cultural resources among the five planning areas, a tally of 9,008 AHRS sites, traditional trails, place names and other identified cultural resources. Of that total, none would be adversely affected by Alternative A; 1,982 by Alternative B; 5,653 by Alternative C; and all 9,008 by Alternative D. Very few of the known cultural resources have been evaluated for the National Register of Historic Places. Potentially, a large percentage of those cultural resources would be eligible for the National Register of Historic Places and be adversely affected by all of the action alternatives. Tribal consultation requirements routinely exercised by federal agencies under the NHPA would be relaxed if lands are transferred to the State. The change in Tribal consultation requirements would be significantly adverse to tribal government interests in their traditional-use areas. Further, the State has had a reputation for disposing of culturally significant archaeological sites throughout the Land for Alaskans program for decades. Retaining federal oversight would provide a higher level of care and preserve the consultation process with Tribes. For these reasons, Maniilaq recommends the agency select Alternative A- No Action to preserve the sacred sites in our region.		
14378-7	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	D1 lands within our region also encompass important sacred sites and cultural use areas. Trade routes and trails used by our Peoples cross many of these D1 lands. These trade routes are not only important for our past, but are also critical to our future, and we consider these trade routes and trails and the traditional knowledge held within them as important to the future of our Peoples. All of the D1 lands within the Ring of Fire Haines Amendment RMP are within these historical trade routes, and BLM has not learned from us about the importance of these routes. No prior planning efforts by BLM accurately reflect our traditional knowledge and history of this region. We look forward to the opportunity to engage with the agency in the future so we can share this information for better land management decision-making. We hope that this traditional knowledge can be an important piece of co-management with the BLM. The map below shows some BLM lands (in yellow) adjacent to a traditional trade route that is a continual stretch of sacred sites for our people.	EIS Section 3.4.1.1.2, Affected Environment, Ring of Fire planning area, already includes reference to the importance of the Chilkat River Watershed (Jilkaat Aani Ka Heeni) and trade routes and trails as important ethnographic resources. See response to comment 13870-2.	Y
14584-1	Michael Stickman		And, you know, the -- the Environmental Impact Statement, you know, I don't think anybody came to Nulato and asked us in Nulato as a -- as a -- as a tribal government or as an indigenous people how it -- how it would affect our daily life. Right now we're -- right now we're getting ready to have our -- our tribal traditional ceremony of stick dance. And with no fish and things like that it's -- it's kind of tough on people, but we're still going to continue our traditions, and we're still going to continue honoring our people that have went on before us with our traditions and our culture. So -- but it -- it makes thing tougher, and these new these new regulations and these new openings are -- are just going to make it that much harder for -- for the people. And one of the rivers that we had applied for area of critical environmental concern was the Nulato River, and it's a salmon spawning river, and, you know, we've had grayling, we've had trout, it have sheefish. And then it's our -- it's a main water source for -- for the village of Nulato too, so it's a very important river for Nulato, but it was denied when we applied for -- the area of critical environment concern for the Nulato River. So, you know, it's just -- everywhere we go we -- we get stopped. I mean, it seemed like they give us opportunity to be involved, but our involvement don't mean nothing.	The Nulato ACEC nomination, as well as other ACEC nominations, are acknowledged and discussed in EIS Section 3.4.1.1.3, Bering Sea-Western Interior Planning Area, to help demonstrate the cultural and biological importance of the watersheds to communities in the region. Therefore, even though no ACECs were designated as part of the Bering Sea-Western Interior RMP, the EIS still uses the knowledge from the ACEC nominations to provide an alternative that retains those resources.	N
14630-5	Emily Johnson	National Park Service	There are outstanding issues in previously submitted comments to Resource Management Plan (RMP) planning efforts; specifically, the need for archeological surveys on a parcel near Klondike Gold Rush National Historical Park.	The BLM is writing a PA to comply with the Section 106 of the NHPA for the proposed project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the project area, and takes their comments into account. Priority areas for surveys are identified during the land use planning process and annual field office priorities.	N
14651-6	Tim Gilbert	Maniilaq Association	The analysis of cultural resources includes sources of data from the Alaska Heritage Resources Survey (AHRS) a recently published extensive manifest of ethnographic place-names and an inventory of ANCSA 14(h)(1) historical places and cemetery sites. Due to significant understaffing, it is broadly understood that the AHRS database grossly underestimates the full range of cultural resources across any particular terrestrial landscape. The cultural resources section of the DEIS admits that a full inventory of cultural resources on ANCSA 17(d)(1) lands is impractical given the extent of the land base and agency staffing. This observation is supported by the comparatively	See response to comment 13984-3.	N

Cultural Resources					
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			large number of ethnographic place-names reported for each planning area compared to the number of cultural resources sites recorded in the AHRs.		
14681-5	Emily Johnson	National Park Service	Land at Mouth of Taiya (Dyea) Klondike Goldrush National Historical Park (KLGO) provided comments on BLM's Ring of Fire Resource Management Plan (RMP) (see 2018 KLGO letter to BLM with resource concerns attached). Find the below quote on page 2 of that letter. NPS believes the archeological inventory completed following the RMP was inadequate and requests that it be repeated to better understand the impacts to the historic resources. "The BLM land along the west edge of the Taiya River Valley (C027S059E Sections 33 & 34) is in a known area of activity during the Klondike Gold Rush and possibly an area of Tlingit use prior to the Gold Rush. Section 34 of this land is within the boundary of the Chilkoot Trail & Dyea National Historic Landmark; although outside the NHL boundary, Section 33 has a high potential to also contain historic and prehistoric sites. ... protect its historic cultural values of national significance as part of the National Historic Landmark. We encourage the BLM to undertake archaeological inventory and monitoring efforts on this land in accordance with Section 110 of the National Historic Preservation Act."	See response to comment 14730-4 regarding impacts to cultural resources and the development of a PA. See response to comment 14695-1 regarding impacts to the Chilkoot NHT.	Y
14681-6	Emily Johnson	National Park Service	Land Across from Skagway (Mt. Harding) The dramatic setting of the Skagway River Valley is described in the National Historic Landmark (NHL) and the viewsheds from the valley to the "snow-capped peaks" and "glacial fields" of Mt. Harding help define the setting and feel of the NHL. NPS requests that BLM consider analyzing impacts to the NHL viewscape before opening lands. "The Skagway & White Pass National Historic Landmark District, located approximately 100 miles north of Juneau, extends from Skagway Bay to the Alaska and British Columbia, Canada, boundary at the White Pass summit. Situated in a deep valley, nestled between snow-capped peaks and surrounded by glacial fields, the district is comprised of the original (1897) Skagway townsite and much of the Skagway River Valley." (page 4 of 1999 NHL documentation) 1999 Skagway & White Pass District National Historic Landmark	See response to comment 13870-2 and 13368-2. The NPS was invited to participate in the development of a PA and invited to sign the PA as a concurring party, in accordance with Section 106 of NHPA, in April 2024. The NPS's expertise on NHLs will be considered when evaluating Section 106 impacts to NHLs.	N
14681-7	Emily Johnson	National Park Service	Klondike Goldrush National Historical Park (KLGO) provided comments on BLM's Ring of Fire Resource Management Plan (RMP) (see 2018 KLGO letter to BLM with resource concerns attached). See the below comment on page 1 of that letter. NPS requests that BLM consider analyzing impacts to the NHL viewscape prior to revoking withdrawals. "The Lynn Canal slope-side of Mt. Harding (from north of the peak, south toward Haines) is the primary scenic view shed from downtown Skagway, with over million visitors a year, and possibly the most viewed BLM land in all of Alaska. ...the Mt. Harding area ... scenic value with state and national significant qualities that give it special worth."	See response to comment 13870-2.	N
14681-11	Emily Johnson	National Park Service	The NPS understands that BLM has started a Section 106 of the National Historic Preservation Act review for this undertaking with ownership change (an adverse effect with lands leaving federal ownership) to the proposed selected lands. NPS requests that BLM contact and include the National Park Service – Alaska Regional Office as a consulting party for the selected lands that may directly or indirectly potentially affect National Historic Landmarks (i.e. Cape Krusenstern Archeological District NHL). Please contact NPS AKR 106 Coordinator, Janet Clemens at janet_clemens@nps.gov .	See response to comment 14681-6.	N
14681-16	Emily Johnson	National Park Service	17(d)(1) lands directly west and north of Lake Iliamna, some of which are directly adjacent to the Lake Clark National Park and Preserve (LACL) boundary, have the potential to directly impact the viewshed and night skies within the park. Development previously proposed in this area showed potential impacts from light pollution extending into the Lake Clark basin and viewshed impacts to Preserve Lands on Roadhouse Mountain. The NPS requests that BLM consider the impacts to the Lake Clark basin and Roadhouse Mountain viewshed from future development.	Nearly two-thirds of Roadhouse Mountain is already occupied by State mining claims. Increased lighting is likely to occur regardless of revocation of the 17(d)(1) withdrawals. No change was made to the EIS.	N
14681-35	Emily Johnson	National Park Service	Some archeological sites likely span the ridgeline between NPS and BLM land, the NPS would like to be consulted during the development of the PA with the SHPO's office to address adverse impacts in these instances.	With respect to NPS involvement, see response to comment 14681-11. The BLM is writing a PA to comply with the Section 106 of the NHPA for the proposed project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, the State, ANCs, local governments, and other organizations with knowledge of cultural resources in the project area, and takes their comments into account. Priority areas for surveys are identified during the land use planning process and annual field office priorities.	N

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14688-4	Susan Georgette		Upper Kobuk family – to some of the Upper Kobuk families used to spend the spring up there and build log – log rafts and float down after breakup. And that area, again, is just full of old camp sites, traps, and stretching boards still hanging in the trees. And honestly this whole area has been occupied for a long time by a lot of people, and there's evidence all over for that. So when I noticed that you're also interested in cultural resources it brought to mind a lot of these things that you get to see if you're out there on the land some.	Information provided in this comment has been incorporated into EIS Section 3.4.1.1.5, Kobuk-Seward Peninsula Planning Area.	Y
14702-24	Catherine Heroy	State of Alaska	Section 3.4.1.1 Affected Environment. The EIS has the following statement: Traditional trail database maintained by the ADNR Division of Mining, Land and Water (ADNR 2023b). Traditional highways, trails, and other ROWs are considered historical resources. Referring to the State of Alaska's RS 2477 database as a traditional trail database is inaccurate and misleading. The database maintained by ADNR, Division of Mining, Land and Water (ADNR 2023b) is a specific type of "traditional trail, or "traditional highway" referred to as an RS 2477. RS 2477s are public rights-of-way for "construction of highways over public lands" under the Revised Statute 2477 in Section 8 of the Mining Law of 1866. RS 2477s should be correctly referred to and cited as "RS 2477 public rights-of-way," rather than informal language such as "traditional highway" or "traditional trail."	U.S. Department of the Interior documents only refer to trails as an RS 2477 if it has been adjudicated. Nearly all the trails claimed by the State to be an RS 2477 have not been adjudicated. Specifically, the trails addressed in this EIS have not been adjudicated and therefore are referred to as traditional trails.	N
14730-4	Kathryn Martin	Ahtna, Inc.	Finally, lifting the D1 withdrawals, and thus transferring title to the land, is a federal undertaking. In many of the withdrawal areas, there have not been any archeological surveys to identify cultural resources that are on the land. Unless a comprehensive effort is made to identify, assess and mitigate potential impacts to cultural resources before the D1 withdrawals are lifted, BLM is not reasonably addressing the effects of opening these lands to this undertaking as mandated by NHPA.	See response to comment 13368-2. The BLM acknowledges that its knowledge of the cultural resources within the decision area is not comprehensive, which is one of the reasons that consultation during both the NEPA and Section 106 of the NHPA process is so critical to the analysis and decision-making process. The BLM is writing a PA to comply with the Section 106 of the NHPA for the project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the decision area, and takes their comments into account. Appendix I (Incomplete or Unavailable information) was added to the final EIS to disclose the process for analyzing if these data were essential to making a reasoned choice among alternatives in the EIS.	N
5775-1	Lydia DeGross		I urge you to retain the D-1 protections on all 28 million acres under review. People and animals need these lands. Undeveloped land has inherent value, it is for wildlife and indigenous peoples, it isn't something to use for mining and industrial development. Alaska Native communities need these areas for food, hunting, gathering, and fishing traditions. These lands have cultural significance. Over 80 Tribes and Tribal organizations in Alaska want this land to stay protected. We as a nation have exploited our natural resources and indigenous peoples for too long. It is time to let nature live, indigenous cultures thrive, and businesses adapt.	Cultural significance of lands to Alaska Native communities is addressed in EIS Section 3.4, Cultural Resources	N

Cumulative					
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10116-2	–	Alaska Wilderness League	Executive Summary page ES-8 states: "The act of revoking 17(d)(1) withdrawals would not cause any direct, specific measurable impacts to the resources under Alternative B, C, or D." This assumption seems to be based on something falling short of the facts and trends of land development of lands managed by the State of Alaska, and should be revisited and rewritten. As it is currently worded, it appears to be a white wash of the potential impacts that are and are not fully presented and discussed in this DEIS. The State of Alaska had continued to accept State Mining Claims on lands that they have top filed on, but has not yet been adjudicated. Those Claims, or clusters of claims, should be included as an overlying map layer on the maps in Appendix A. Without including this information as part of the analysis in this DEIS, it is easy to see how the future impacts of mining and development could be overlooked or dismissed in this document.	As per 40 CFR 1508.1(g)(1), direct effects are those which are caused by the action and occur at the same time and place. Indirect effects occur later in time or farther removed in distance but are still reasonably foreseeable (40 CFR 1508.1(g)(2)). As stated, the quoted sentence in the comment is correct. As described in the RFD scenario in EIS Appendix D and in EIS Section 3.1, Introduction and Methodology, development on top filed lands (including mining) is analyzed throughout the EIS. State mining claims on Federal land are claims filed with the State on effective selections that would become effective claims if the land is conveyed to the State. These are included in the EIS analysis and are described in RFD Section 3, Locatable Minerals, in EIS Appendix D. The EIS considers areas within 1 mile of existing State or Federal mining claims to be <i>more likely to be developed</i> as a result of the Secretary's decision on this project. Thus, the areas more likely to be developed are evaluated throughout the EIS.	N

Cumulative					
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			<p>DNR Mapper programs, showing mining claims, both current and those that have staked on state selected land that is not yet adjudicated, should be maps that are incorporated into this planning effort. They can be found at: https://mapper.dnr.alaska.gov/controller? Do=load_map-_id=21679#map=7.393865966796827/-18149467.38/9440551.05/0</p> <p>There is a vast difference in the mining laws and regulations pertaining to Alaska State Lands versus Federal Lands. This document attempts to minimize the differences. A very basic place to start would be this simple comparison chart and these additional sources of information that can be found with a simple web search:</p> <p>1. https://dnr.alaska.gov/mlw/cdn/pdf/factsheets/investigate-claims-before-purchase.pdf "In Alaska, there are two sets of mining regulations to become knowledgeable with: State and Federal.Regulations differ considerably, depending on who manages the land on which a claim may be located, and can be confusing." This site states: "While a small number of areas are still unexplored, easily accessible areas with a history of mining are, for the most part, already claimed – some with multiple and complex issues to deal with."</p> <p>2. https://www.blm.gov/sites/default/files/documents/files/Mining_AK_Placer-MiningOperations and Claims-Guide.pdf A 2020 Fact Sheet developed by BLM, USFS, AKDNR and AK Miners Association – spells out differences between the rights and obligations of mining in Alaska. There are substantial differences in rules and regulations depending on the state or federal management of the lands where the claim is located.</p> <p>3. https://dnr.alaska.gov/mlw/cdn/pdf/factsheets/mining-on-state-selected-land.pdf This fact sheet lines out the process and rules for mining on State-selected land in Alaska.</p>		
10116-4	–	Alaska Wilderness League	<p>A proposed action of this type has the massive potential to have snowball effects to the economy, land use, water, soils, potential to permafrost melting, methane gas release, fisheries, animals, air quality, noise, climate change, subsistence resources and users, to name a few. These need to be given serious discussion.</p>	<p>The EIS does review the impacts mentioned in the comment. Direct, indirect, and cumulative effects to the topics mentioned in the comment are described in EIS Section 3.5, Economics; EIS Section 3.10, Realty and Lands; EIS Section 3.17, Water Resources; EIS Section 3.13, Soils and Permafrost; EIS Section 3.3, Climate; EIS Section 3.7, Fish and Aquatic Species; EIS Section 3.2, Birds and Special Status Birds; EIS Section 3.15, Terrestrial Mammals; and EIS Section 3.14, Subsistence. EIS Table 1.6-2, Issues Identified but Eliminated from Detailed Analysis, describes the rationale for eliminating noise and air quality from detailed analysis.</p>	N
10116-5	–	Alaska Wilderness League	<p>CUMULATIVE IMPACTS A. These sections are poorly written, vague and obtuse. They appear to mention some of the larger mines or development projects that will be forthcoming if these lands are conveyed out of federal management, but then quickly marginalizes and diminishes any potential impacts. The purpose of this section should be lay out and analyze how the potential effects of these Alternative actions are additive or interact with other effects in the State of Alaska now and into the future. Sadly, these sections look like a place holder for what should actually be written. B. It is hard to fathom how Cumulative impacts on the analysis for transfer of up to 27,735,000 acres, a total acreage of land greater than the size of Iceland (25,452,000 acres) that has the potential to change not only the subsistence management and regulations, but also the future environmental regulations on any potential future development, could be summarized, marginalized and dismissed in a few short paragraphs.</p>	<p>See definition of a <i>withdrawal</i> in EIS Section 1.2, Background. The Secretary's decision would not change the regulations for subsistence management and would not change environmental regulations for future developments. The assertion that there would be a change in regulation to management of any resource is incorrect. The Secretary's decision is limited to revoking, partially revoking, or maintaining the withdrawals. This would affect the location of where certain uses can occur within the decision area and not the management of those uses. Cumulative impacts to resources are disclosed in EIS Chapter 3, under each resource. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. The level of detail contained in the cumulative impacts analyses is appropriate to the level of detail contained in the direct effects analyses.</p>	N
11609-1	Louise Stanton		<p>Please don't lift the D-1 protections and open the BLM lands in Alaska to industrial development that would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds.</p>	<p>See response to comment 14641-40.</p>	Y
123-1	Linda (Lou) Brown		<p>The very remote locations described in this EIS make it vanishingly unlikely that developers could engage in today's large-scale industrial mining without causing significant damage to ecosystems harboring the fish and wildlife that is relied upon by Alaska Native people in more than 100 villages across the state. Our state has seen case after case where the military and miners have left behind toxic materials, radically altered water courses and landscapes that BLM (and DNR) has not had the resources to force developers to mitigate.</p>	<p>Additional text was added to EIS Section 3.17.1.1, Water Resources, Affected Environment, regarding legacy or abandoned mine lands and how they contribute to existing conditions. Effects from potential mines and access to them is described for all resources analyzed in detail throughout Chapter 3 of the EIS. For example, Section 3.17.1.2.2, Water Resources, Impacts Common to All Action Alternatives, describes potential impacts to water quality from mines and access roads. Any extensive mineral exploration requires a plan of operations, which would be reviewed to ensure it does not cause undue and unnecessary degradation, and an associated NEPA analysis would be completed, both of which would require approval by the BLM authorized officer. Each level of exploration activity, either a notice or plan of operations, requires bonding before operations can begin.</p>	Y

Cumulative					
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12922-2	–	Alaska Wilderness League	There is overwhelming scientific evidence and an international consensus on the severity of the climate crisis and the urgent need to phase out fossil fuels. The attached IPCC report provides an excellent summary of that science and consensus. There is also mounting scientific evidence on how the rapid loss of native species poses enormous environmental threats, including the disruption of ecological systems and processes that humanity relies upon. Given these overlapping and deadly serious crises, every proposed action should be judged on how it would affect energy use and biodiversity.	See response to comment 13379-5 regarding climate change. Biodiversity is addressed in EIS Section 3.2, Birds and Special Status Bird Species, and in Section 3.7, Fish and Aquatic Species.	N
13288-1	–	Tulkisarmute Incorporated	Hello there, This is the Tulkisarmute Corporation a population of about 457 people in the Native Community of Tuluksak would like to oppose the opening of the ANCSA 17 (d) (1) withdrawals because of the affect our subsistence way of life, affecting the animals and fish that are in the areas, these mines are on the (if opened) like the Gold mines above Tuluksak have affected the livelihood of the people of Tuluksak. If really affects the health of all the people that live in the areas that are in those areas that are proposed to be opened. The Tuluksak community members are opposing these because the gold mines in NYAC did affect the health and well being of our communit members, not only did it affect our livelihood and health, it also affect our subsistence animals and fish that live in our river.	Additional text was added to EIS Section 3.1.2, Past and Present Actions, to clarify that prior mining activity (such as that in the in Nyac mining district) has contributed to the existing condition of the affected environment and was analyzed throughout EIS Chapter 3. The gold mines in Nyac were established at a time with less regulation under both State and Federal management, and similar effects are not expected as a result of the Secretary's excision on this project. The effects of the project on subsistence are described in EIS Section 3.14, Subsistence, and effects on public health are described in EIS Section 3.12, Social Systems.	Y
13340-1	Shannon Donahue	Rivers Without Borders	Due to the mineral potential of the lands on the western extreme of the Haines Area D1 lands, and existing mineral exploration and placer mining to the west of them, we are concerned about potential impacts of mineral development in the Kelsall and Chilkat river drainages, should protections be lifted. By remaining under protection from mineral development, the Haines Area D1 lands may offer a buffer to the adjacent lands to the west that are currently under pressure from the Palmer Project's advanced-stage mineral exploration and associated road development and deforestation.	The Palmer Project was added the list of reasonably foreseeable future planned actions in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area, and added to the cumulative effects analysis. The withdrawals in the Haines area would be retained under Alternatives A and B.	Y
13340-2	Shannon Donahue	Rivers Without Borders	We urge the BLM to consider the cumulative impacts of its management of D1 lands in concert with management, development, and proposed and existing uses of adjacent and nearby lands and waterways. We are especially concerned about cumulative impacts with regard to development of BLM and state lands to the west of the Haines Area D1 lands that are currently in mineral exploration by the Palmer Project, and/or slated for timber harvest. Due to pressure from mineral exploration and mining, timber harvest, road development, and commercial recreational uses including heliskiing, the impacts of opening Haines Area D1 lands to mineral development could have broader cumulative effects than anticipated if considering the impacts of D1 withdrawals in isolation.	The Palmer Project and Haines State Forest timber sales were added the list of reasonably foreseeable planned actions in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area, and added to the cumulative effects analysis. The withdrawals in the Haines area would be retained under Alternatives A and B.	Y
13377-1	John Oscar		Climate change exacerbates the situation, further challenging the sustainability of remaining fish resources. The proposed BLM to open its lands for future development poses a direct threat to these delicate ecosystems, potentially altering the lands, including temperatures in the headwaters, altering oxygen levels, as silty water absorbs more heat and affecting the very birthplaces of these vital species. Any change in temperature in the headwaters has already impacted critical habitat areas. Thereby causing extinction of someone's food on the table.	See response to comment 13379-5. Impacts to fish are provided in EIS Section 3.7 Fish and Aquatic Species.	N
13379-5	Alex Whiting	Native Village of Kotzebue	While removal of subsistence protections are the most obvious and immediate impact of removal of lands from the federal inventory, as land becomes opened up to industrial or similar development activities, there can be expected to be additional impacts from habitat destruction, acid rock drainage, permafrost degradation, and related water quality degradation. Climate change is already altering the lands and water in the northwest Alaska region that provide critical habitat to birds, fish, and mammals. It is death by a thousand cuts, in that the climate stresses currently being experienced by these living resources, are compounded by additional human caused direct impacts.	Climate change is noted in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions, as a reasonably foreseeable trend statewide. It was considered as part of the existing conditions and considered in the cumulative effects analysis of each resource section of EIS Chapter 3.	N
13445-3	Richard Slats		Our people have cared for our ancestral lands for millennia, sustainably using resources from the land while protecting waters and lands to ensure our people have food and can engage in cultural practices. These lands and waters provide our communities with clean drinking water and healthy subsistence foods. The undersigned Tribes and Tribal organizations are concerned that lifting D-1 protections and opening these lands to mining will expose these important resources to contamination from mineral exploration and mining development. Our Tribes, Tribal organizations, and our people have engaged in the public process around the state and federal permitting of the Donlin Gold Mine project. Through those processes we have expressed our grave concern for the health of our lands, waters, and people and potentially significant and irreversible impacts of mining to our subsistence resources. Additional mineral entry and mining development on BLM lands would exacerbate these impacts and compromise our clean drinking water and health of our communities.	Potential impacts to subsistence access, resource abundance, and resource availability from possible contamination due to various types of development are described in EIS Section 3.14, Subsistence.	N

Cumulative					
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13560-1	Danielle Williams		These 28 million acres under review serve as important carbon sinks for the planet. They also support an abundance of globally, locally and culturally significant biodiversity - all five species of Pacific salmon, three of North America's largest remaining caribou herds, a vast number of migratory bird species and more. Removing the current D-1 protections and opening the lands to industrial development would threaten increasingly critical migratory corridors and salmon streams, carbon-storing capacity as well as food security for Alaska Native communities.	See response to comment 14641-40.	Y
13567-1	Seth Kantner		Cutting up Alaska into industrial zones would destroy the intact habitat of needed wildlife and fish streams, destroy the Alaska we cherish and count on for our food security, and would destroy vast intact ecosystems needed by the earth itself	See response to comment 14641-40.	Y
13628-24	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	A 2003 report on the cumulative effects of oil and gas activities on the North Slope of Alaska concluded that the effects of oil infrastructure are not limited to the footprint of development (NRC 2003). Caribou are a prime example, exhibiting persistent displacement from developed areas that has spanned decades despite mitigation efforts (e.g., Cameron et al. 2002, Johnson et al. 2020, Prichard et al. 2020). This is also true of mining activities where displacement is observed (e.g., Plante et al. 2018, Boulanger et al. 2021). Similar impacts are also observed in other species and natural processes (NRC 2003). Such indirect influences will increase the extent to which D1 Withdrawals are impacted by infrastructure and should be incorporated into the RFDS. Furthermore, the history of development on the North Slope of Alaska has demonstrated the enduring nature of landscape alteration. Nearly all the roads, pads, pipelines and other infrastructure ever built are still in place (NRC 2003). This enduring legacy of potential development is important to thoughtfully reflect in the RFDS and the FEIS.	Past and present projects are identified in EIS Section 3.1.2, Past or Present Actions, and are considered part of the affected environment and analyzed for cumulative impacts throughout EIS Chapter 3.	N
13845-1	Emerie Fairbanks-Diehl		Currently, we have 3 abandon mines on our river, 2 of which haven't been cleaned up yet. The Red Devil Mine AML (Abandon Mine Lands) and The Nixon Fork Mine and 1 which has only been partially remediated, the Kolmakof Mine. These mines are in need of funding to get the clean up done, and as they sit waiting for that funding, the risk of contaminated materials being disrupted, if they haven't been already, is increasing. I'm sure some of you remember a few years back when there was a public meeting here to go over the clean up options for the Kolmakof mine. One option, was to pack up all the remaining contaminants and barge them out. This was the most expensive option but in my opinion the best and safest, in order to best return the land back to how it originally was. The majority of people at the meeting were for that option. They decided to go with the least expensive option and not the option that was best for the area. With lack of funding already being an issue how can we be thinking about opening up more land that will most likely require some sort of clean up in the future?	Red Devil Mine Cleanup is a planned action listed in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area. The potential effects of new mines that could result from the Secretary's decision on the project are analyzed in each resource section of EIS Chapter 3, Affected Environment and Environmental Consequences. Any extensive mineral exploration requires a plan of operations, which would be reviewed for undue and unnecessary degradation, and an associated NEPA analysis would be completed, both of which would require approval by the BLM authorized officer. Each level of exploration activity, either a notice or plan of operations, requires bonding before operations can begin. See also response to comment 14604-1.	Y
13845-2	Emerie Fairbanks-Diehl		How can we possibly be considering opening up BLM lands for further development when we can't even afford to clean up the current abandon mines directly on our river? The Kolmakof mine clean up project has been in the works since May of 2000, 24 years later and this mine site is yet to be fully cleaned up. Funding always seems to be an issue and who is responsible for clean ups always seems to be a heated topic of discussion. And unfortunately this mine site is with in a mile of my families camp site which if the land is disrupted could have negative impacts on our subsistence activities at our camp site as well as the rest of the river.	Any extensive mineral exploration requires a plan of operations, which would be reviewed for undue and unnecessary degradation, and an associated NEPA analysis would be completed, both of which would require approval by the BLM authorized officer. Each level of exploration activity, either a notice or plan of operations, requires bonding before operations can begin. See response to comment 13845-1.	N
13882-2	Michelle Meyer	Yakutat Tlingit Tribe	Opening the D-1 lands to industrial development would pose significant risk to the sustainability of these fish and wildlife populations that are already under enormous stress from environmental changes due to climate change.	See response to comment 13379-5.	N
13952-2	Margaret Tran	Natural Resources Defense Council (NRDC)	These treasured lands support communities, cultural resources, subsistence resources, and recreation like hunting and fishing. And they're at the forefront of the climate crisis.	See response to comment 13379-5.	N
13984-7	Chief Gary Harrison	Chickaloon Native Village	The lands subject to ANCSA 17(d)(1) withdrawals hold significant cultural and historical importance to Alaska Native communities. Revoking these could significantly impact Alaska Native Peoples rights and Tribal sovereignty. It's crucial to respect the autonomy of Indigenous peoples and involve them in decision-making processes that affect their lands and livelihoods. Each year Alaska Native Allottees and Alaska Native Corporations (ANC) have to deal with trespass and illegal mining on their lands. If ANCSA D1 land withdrawals are revoked illegal mining and trespass could increase. The State of Alaska is unwilling to prosecute trespassers or illegal mining. The federal government might be better situated to prosecute illegal mining but the federal process is very cumbersome and there is no guarantee that prosecution would occur. Illegal mining and trespass have been going on for decades in rural Alaska and rural Alaskan communities must deal with the brunt of burden and suffer the consequences of illegal mining and trespass. Opening lands subject to ANCSA 17(d)(1) withdrawals is met with skepticism and opposition due to their potential adverse environmental, cultural, and socioeconomic impacts.	The RFD scenario in EIS Appendix D projects reasonably foreseeable activity for a defined area and period that is used for analysis purposes in EIS. Though some areas are more likely to be developed than others, no development plans have been submitted. Extrapolating that trespass onto Native lands would increase as a result of the Secretary's decision on the EIS would be speculative. Such effects of specific potential projects that would increase access to an area would be addressed at the project-specific level and be subject to project-specific environmental review.	N

Cumulative					
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13986-1	Ruth Wood		<p>I live in Talkeetna, but the lands north of the town, the lands along the Susitna River, its tributaries, and its headwaters are in this planning area. There is no question but that the withdrawals along the Susitna River, Disappointment Creek, Watana Creek, south of Prarie Creek, to name a few, absolutely must be retained. Revoking these withdrawals would be devastating to the entire Susitna watershed.</p> <p>Of great concern to those of us who live in the Talkeetna area is the proposed Susitna-Watana Dam (mentioned in 3-17.) Although the dam has not been an open project since 2016, talk about reviving it never completely dies. A number of scientific studies required by the Federal Regulatory Agency Commission (FERC) for licensing were conducted before the project was halted. The studies were required because the impacts to salmon, caribou, habitat, etc. of creating a "Surface Area Impoundment of 23,488 acres; a 750- foot-high dam with a 42-mile long reservoir" (see 3-17) would monumentally and negatively impact the entire Susitna Watershed. Revoking the withdrawals that would allow these lands to go into State or private ownership would be unconscionable.</p>	See response to comment 13851-3.	N
13986-2	Ruth Wood		Any revocations of withdrawals in the vicinity of any big controversial project should be rejected. These include lands in the Bristol Bay area that could expedite the Pebble Mine, and lands near the Ambler Road project. Big projects have big impacts, and revoking the withdrawals would allow these lands to go into state or private ownership where the impacts likely would not be fully evaluated and mitigated.	Ambler Road and Pebble Mine are identified as planned actions in EIS Table 3.1-6, Reasonably Foreseeable or Planned Action in or Near the Decision Area. Therefore, the impacts of how each alternative add to the effects of these projects is considered in the cumulative effects analysis for each resources. Additionally, retaining all withdrawals in BLM management is considered under Alternative A, and retaining many of the withdrawals surrounding Ambler Road and Pebble Mine are also proposed under Alternative B and Alternative C. The act of revoking 17(d)(1) withdrawals would not permit construction of these planned actions; any authorizations made by the BLM in connection with construction of these mines would have to be evaluated under separate project-specific environmental review.	N
13986-3	Ruth Wood		One of the problems with trying to analyze proposals that encompass huge amounts of acreage, i.e., 28 million acres, is that the analysis cannot do the task justice. While BLM can point out the number of acres that will be impacted, they cannot adequately describe the extent of the impacts. And, they cannot adequately identify the compounding impacts across species and habitat. Impacts to salmon, for example, also impact bears, other mammals, and birds. Decaying salmon supply nutrients to the water, and that impacts insects. The relationships are complex.	The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. One EIS is sufficient to disclose resource impacts to these actions across 28 million acres.	N
14023-1	Derrick Wilkerson, Charles Dodge	Federal Aviation Administration; Federal Aviation Administration	<p>As discussed by BLM, one of the potential impacts of revocation of withdrawals--affecting about 28 million acres of BLM-managed lands (DEIS, 1-3)--is opening land to mining claims. How this could impact FAA withdrawals at each of the five FAA withdrawal locations (Air Navigation Sites 145 (McGrath), 167 (Gulkana), and 190 (Lake Minchumina), Kotzebue Air Navigation Facility (PLO 3830), and Talkeetna VORTAC (PLO 2713)) and what impacts might occur at other airports or navigational aids on or in the vicinity of the withdrawals, has not been discussed. The current DEIS gives inadequate analysis to potential direct or indirect impacts as follows: (1) impacts to the potentially affected airport facilities; (2) impacts to potentially impacted navigation aids; (3) impacts to nearby communities that might rely on these airports/navigational aids if disruptions to air navigation were to occur; (4) impacts to emergency evacuation flight routes or accessibility.</p> <p>Large parts of Alaska are not accessible without air support. Communities rely on air navigation for delivery of food, medicine, mail and so on. Indeed, it is fair to say that aviation is a crucial lifeline for rural Alaskan communities. Yet--and somewhat surprisingly--the BLM does not appear to address direct or indirect effects of its proposed actions on airports/navigational aids in sections such as (1) Realty (3.10.1.2.2, 3.10.2.2.2); (2) Transportation Systems and Traffic (3.11.2 and 3.11.2.2.2); or (3) Social systems (community facilities, services, and infrastructure) (generally at 3.12).</p> <p>While BLM has referenced certain maps in the DEIS, Appendix D (Reasonably Foreseeable Development Scenario), that outline leasable minerals, locatable minerals, and so on, the maps are too general to make any site-specific determinations. The FAA does acknowledge receipt of certain maps derived from the BLM's ePlanning website. (BLM Email, Feb. 5, 2024.) These maps are specific to the five FAA withdrawals but, again, have not received particularized discussion in the DEIS. Further, and as noted above, impacts could also occur to other airport/navigational aid sites that fall within the broad area of the BLM's proposed revocation action.</p>	<p>As described in EIS Section 3.1.1.2, Reasonably Foreseeable Development Scenario, "no development plans have been submitted". Thus, it would be speculative to assess impacts to airport facilities, navigation aids, etc. Any project-specific development would receive project-specific analysis once a proposal is received with details allowing analysis of impacts to specific facilities or navigation aids.</p> <p>Pursuant to FLPMA 204(i), the Secretary must receive the FAA's consent to the revocation of the 17(d)(1) withdrawals that overlap lands with other Federal withdrawals. The FAA has five overlapping withdrawals. The areas surrounding the listed sites above are private-, State-, or Native-owned land and are outside the scope of the EIS decision area.</p>	N
14288-1	Ryan Astalos		Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds. In a region experiencing rapid ecological fluctuations due to climate change, opening the D-1 lands will also undoubtedly create	See response to comment 14641-40.	Y

Cumulative					
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			more stress on fish and wildlife populations and jeopardize the ability of these natural systems to support vital subsistence resources, Alaska Native communities, and hunting and fishing opportunities.		
14378-1	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	Many of these D-1 lands are directly within the Palmer Project site, an advanced mining exploration area on our Traditional Lands that is opposed by our Tribal Government.	See response to comment 13340-1.	N
14378-4	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	Subsistence and traditional practices require large, intact landscapes. Salmon, mountain goats, grizzly bear, black bear, bald eagles, geese, and many other species we depend on also need intact lands and waters to survive. The D1 lands within our region represent important corridors for these animals and plants that we rely on for our health and well-being. Removing D1 withdrawals within the Ring of Fire Haines Amendment region would further fragment an already fragmented landscape and threaten success of some wildlife species. Already, we are seeing declines of mountain goats within our valley and the Chinook (King) salmon fishery has been closed in the Chilkat and Chilkoot Rivers for several years due to low returns. Fragmenting these lands would also present challenges to subsistence and traditional gathering, fishing and hunting opportunities because if these lands are conveyed to the state of Alaska, ANILCA subsistence priority will no longer be available on these lands.	See response to comment 14641-40.	Y
14462-2	Geoffrey Parker	Bristol Bay Fishermen's Association	Second, BBFA is concerned that revoking the PLOs which affect d-1 lands in the Bristol Bay drainages could be used by proponents of Pebble mine to justify a decision by the U.S. Environmental Protection Agency (EPA) under a future administration to rescind EPA's recent 404(c) of the Clean Water Act to protect certain aquatic resources and uses in the headwaters of the Koktuli River and Upper Talarik Creek in the Bristol Bay drainages by prohibiting discharges of dredged or fill material associated with the 2020 mine plan of the Pebble Limited Partnership to develop the Pebble deposit, and by restricting such discharges associated with future mine plans to develop that deposit. BBFA has expressed its concerns to EPA that its 404(c) determination may be unstable factually, legally, and politically.	Pebble Mine is identified as a planned action in EIS Table 3.1-6, Reasonably Foreseeable or Planned Action in or Near the Decision Area. The act of revoking 17(d)(1) withdrawals would not permit construction of the mine. The proposed mine would have to be evaluated under a separate project-specific environmental review.	N
14563-2	Michael Spindler		Wildlife and biodiversity research in recent decades have found that maintenance of intact habitat connectivity corridors, and avoidance of fragmentation are among the most important actions managers can take in order to allow biological populations and ecological communities to have resilience in dealing with climate change and other stressors (Hellar and Zavaleta 2005, and Beever et al. 2015).	See response to comment 14641-40.	Y
14572-4	Barry Santana		Lifting the 17(d)(1) protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds, and impact more than 5,000 miles of important salmon streams that nourish entire watersheds. The fact that Alaska land, habitat, fish and game has been decimated significantly (by my observation) in the last 30 years from unknown causes, it seems obvious that we need to do everything we can to maintain the remaining status quo.	See response to comment 14641-40.	Y
14591-3	Geoffrey Parker	Bristol Bay Fishermen's Association	The following map from EPA's 2014 watershed assessment depicts the locations of the Pebble deposit and fifteen other prospects, deposits, or blocks of mining claims for locatable minerals in the Kvichak and Nushagak drainages which had experienced recent exploration as of 2014, some of which appear to be on d-1 lands. See also accompanying text and Table 13-1 for some details on the nature of the deposits. Most are porphyry copper deposits like the Pebble deposit. Mining such deposits poses risks to salmon habitat for the reasons addressed in the assessment and the subsequent 404(c) determination.	See response to comment 14462-2.	N
14604-1	Grant Fairbanks		Finally these D-1 lands we are talking about here today are partially located in the Kuskokwim Mercury belt and many past and future mines in the area run into mercury disposal problems and in an area where mercury in fish is a big problem already.	The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. Existing water quality conditions, including high mercury levels in the Kuskokwim River area are described in EIS Section 3.17.1.1, Water Resources, Affected Environment. Additional text was added to that section regarding legacy or abandoned mine lands in the area. Impacts on water quality from mining development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. Discussion of reasonably foreseeable mining development that could impact water quality is in EIS Section 3.17.1.2.7, Water Resources, Cumulative Impacts. Impacts of mining on	Y

Cumulative					
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				fish are discussed in EIS Section 3.7, Fish and Aquatic Species. A description of areas more likely to be developed (and thus more likely to impact water quality) is in RFD Section 3, Locatable Minerals, in EIS Appendix D.	
14630-7	Emily Johnson	National Park Service	Important factors may have been minimized by the methodology used to develop the Reasonably Foreseeable Development (RFD) scenario. Known development projects, such as the Ambler Access Project, were not considered or mapped for review.	The Ambler Road is a planned action identified in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area. As described in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions, the BLM considers reasonably foreseeable trends and planned actions when they would affect resources of concern within the geographic scope and the timeframe of the analysis (40 CFR 1502.15). Reasonably foreseeable trends and planned actions are considered in the affected environment and cumulative impacts analysis for each resource. The RFD scenario in EIS Appendix D describes and quantifies potential development activity in the decision area only. Thus, planned actions outside the decision area are not included in the RFD; they are listed in EIS Table 3.1-6 and analyzed in the affected environment and cumulative impacts analysis for each resource.	N
14641-36	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Additionally, keeping land intact mitigates the effects of climate change by providing habitat protection for wildlife, which becomes increasingly important as various species shift their range.181 Keeping withdrawals in place helps to ensure that wildlife and fish stocks are not further stressed by degradation of their habitat due to climate change, rising temperatures, wildfires, and pests.	See response to comment 14641-40.	Y
14641-38	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS does not provide the public a comprehensive understanding of the degree of impacts climate change is causing and how lifting the ANCSA 17(d)(1) withdrawals can exacerbate the harmful effects. While BLM has acknowledged that climate change will continue to affect all resources and industrial development will likely further exacerbate changes to vital habitat of several species, it has not provided a comprehensive analysis of Alaska's environment that is undergoing massive change. For example, the DEIS does not address or analyze natural contributions to greenhouse gas emissions through permafrost thaw and wildfires. The DEIS also fails to assess precipitation changes and associated impacts on vegetation, which would be further exacerbated by development and habitat fragmentation. Additionally, the DEIS does not provide a range or projection of how much more land could be impacted by disturbances related to climate change, it simply estimates "[e]xisting disturbance in the analysis area occurs from disease, fires, insect infestations, wildlife, and weather events and covers approximately 5 percent (1,414,000 acres)."	See response to comment 10116-8 and 14641-40.	Y
14641-40	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS does not adequately recognize or analyze the importance of connectivity and BLM should provide a more detailed analysis of this important issue in the final EIS. Loss of connected natural habitat is one of the main problems in current conservation efforts. The connectivity of a landscape is key to establishing the overall persistence, strength, and integrity of the remaining ecological interactions and must be considered in the DEIS. Despite being such an important consideration for wildlife, terrestrial mammal habitat connectivity is scarcely mentioned in the DEIS. The DEIS should include an analysis of habitat connectivity, identification of potential wildlife corridors, and the implications of the alternatives for protecting and/or restoring important corridors.	Additional text regarding the importance of habitat connectivity and potential impacts to it from revocation of 17(d)(1) withdrawals was added to EIS Sections 3.2, Birds and Special Status Bird Species; EIS Section 3.7.2.2.7, Fish, Cumulative Impacts; and EIS Section 3.15, Terrestrial Mammals.	Y
14641-45	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal	[a] major shortcoming of this DEIS is its failure to acknowledge and consider the potential landscape and watershed level effects on fish and other aquatic biota, particularly biodiversity and population portfolios. Human modification of the landscape is the predominant cause of biodiversity loss (Des Roches et al. 2021) by reducing or eliminating the segments of populations (Davis and Schindler 2021, Munsch et al. 2022, Price et al. 2023). Fragmentation, the elimination	See response to comment 13731-1 and 14641-40.	Y

Cumulative					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
	Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	of or reduction of access to what may be presumed to be even a relatively small proportion of the total available habitat, could reduce biological diversity and resilience (Haddad et al. 2015, Hanski, 2015) and increase extirpations (Crooks et al. 2017). These effects can last for decades and compromise a population's ability to respond to future changes (Bouska et al. 2022, Munsch et al. 2022, Leppi et al. 2022). Failure of the DEIS to consider this likelihood significantly underestimates the effect of the various alternatives.		
14641-48	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	<p>Past and Present Actions Should Be Better Described and BLMs Analysis of Their Effects Made More Clear.</p> <p>Regarding BLM's consideration of past or present actions, the DEIS provides a very basic list that includes general topics of projects grouped by planning area, such as "village and community infrastructure" or "limited and disconnected road system." The referenced maps indicate where various projects are by category, but also offer little information. Because BLM relies on Table 3.1-5 and the maps, very little information is provided concerning past and present actions; there are no project names, descriptions, or discussions of specific impacts on the project area for each resource. The DEIS states that individual resource sections analyze the impacts of these past and present actions with more specificity based on where the actions are occurring. However, the affected environment sections for the various resources discuss the past and present actions broadly and at a high level; the various resource sections lack meaningful detail about the past and present projects occurring and their impacts on the resource being discussed. The lack of detail about past and present actions makes it incredibly difficult to understand what projects BLM is considering when it sets out the past and present actions or to evaluate whether BLM's description of the affected environment is accurate. Simply put, it is unclear how the BLM is evaluating the past and present actions as part of its analysis in a meaningful way. Without more information, it is also unclear whether BLM's cumulative impacts analysis accurately considers the impacts of past, present, and reasonably foreseeable future actions.</p> <p>The fact that BLM has maps of the project locations indicate that BLM has at least some information about these projects. Groups, therefore, recommend that BLM include short descriptions for the individual projects in each action area so that the public can better understand what past or present project BLM is considering, help identify ones that may be left out, and evaluate whether BLM accurately considered the impacts of these past and present projects in the final EIS.</p>	The requested cataloging of all past actions is not essential to making a reasoned choice among alternatives. The summaries of past and present actions by planning area are in EIS Table 3.1-5 and in EIS Figures 3.1-1 through 3.1-5. This level of detail is sufficient for the size of the decision area and the level of analysis completed. Project-specific details of past and present projects would be more appropriate for project-specific NEPA documents.	N
14641-49	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	<p>Reasonably Foreseeable Actions Should Be Described in Greater Detail and Better Analyzed.</p> <p>Similar to its presentation of past and present actions, BLM provides a list of the reasonably foreseeable or planned actions. The information provided is minimal: the project type, name, a very brief description, the planning areas impacted, and the size of the project (if known) are all that BLM includes. There's no indication of when projects may break ground, be completed, or how long they may operate.</p>	As described in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions, "the BLM considers reasonably foreseeable trends and planned actions when they would affect resources of concern within the geographic scope and the timeframe of the analysis (40 CFR 1502.15)." The level of detail in the EIS is sufficient for the size of the decision area and the level of analysis completed. Additional project-specific details of reasonably foreseeable trends and planned actions would be more appropriate for project-specific NEPA documents.	N
14641-50	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife;	Regarding the reasonably foreseeable actions, the information about the Donlin Mine and infrastructure is incomplete. The project description does not appear to include the 25-mile road from the planned port near Bethel to the mine, and it is unclear if BLM is including the full acreage that will be impacted by the pipeline and fiber-optic ROW.	EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area, was refined to include the length of the road. Other information is already included in the table.	Y

Cumulative					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
		Audubon Alaska; Alaska Wilderness League			
14641-51	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The cumulative effects sections for the various resources should be revised to include the necessary analysis. For example, when describing the cumulative effects on bird habitat, the DEIS simply says "[t]his development [i.e., the development of areas where State Priority 1 and 2 effective selections are conveyed], considered in the context of the reasonably foreseeable trends and planned actions could affect bird habitat in similar ways to those described in Section 3.2.1.2.2." The section referenced at the end of the sentence addresses bird habitat Impacts Common to All Action Alternatives. That is, BLM's cumulative effects analysis simply states, without any basis, that the impacts from past, present, and reasonably foreseeable actions will be the same as the impacts from the proposed action. There is no explanation of how BLM reached that conclusion. There is no discussion of whether, even if the impacts may be similar, the intensity or duration of the impacts may change, or what areas will be additionally impacted. In the cultural resources section, the DEIS generally describes the types of impacts that could occur to cultural resources from development in very general ways. It then concludes that revocation of the withdrawals "in combination with reasonably foreseeable trends and planned actions in the analysis area[] has the potential to lead to cumulative effects on cultural resources" and concludes that because Alternative D lifts the withdrawals on the most lands, it would have the largest contribution to cumulative effects on cultural resources. In its economics analysis, BLM includes similar summary statements, as well as the statement that "[t]he cumulative impacts of any Secretarial revocation of the 17(d)(1) withdrawals (and potential resulting development) when combined with the effects of reasonably foreseeable and planned actions would also additively diminish the non-use and passive use values in the different regions." There is, however, no actual analysis of what the impact on non-use and passive use values would be.	As stated in EIS Section 3.2.1.2.7, Bird Habitat, Cumulative Impacts, the types of impacts from RFAs would be the same as those described for revocation of withdrawals because they would be caused by similar types of actions (mineral extraction or leasing, roads, etc.). It is unknowable on a parcel-by-parcel basis the exact location of any potential development. The same is true for cumulative effects to cultural resources and economics. See also response to comment 14641-40.	Y
14641-54	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	In the fish habitat section, BLM states that the impacts expected from foreseeable trends and planned actions would impact aquatic habitat similar to the impacts that would be common to all action alternatives. BLM also summarily states that "some of the larger projects (e.g., mine development, oil and gas development, port expansion) would contribute to local or even regional impacts to aquatic habitat that could be compounded when the effects of 17(d)(1) withdrawals are added to them" and that when the 17(d)(1) withdrawals "overlap with reasonably foreseeable or planned large-scale development (e.g., Ambler Road and associated large-scale mining projects, the Susitna Watana Dam, the Donlin mine and pipeline, the liquified natural gas (LNG), the Graphite One Mine, and the Manh Choh Mine), effects to aquatic habitat could be compounded." But there's no analysis of the impacts of those planned and reasonably foreseeable developments on fish habitat. Just statements that aquatic habitat "could cumulative decrease or degrade" or that it could "completely remove aquatic habitat." These examples, and the additional discussion above for specific resources, show that BLM's cumulative impacts analysis is lacking.	See response to comment 14641-51 and 10116-5.	N
14641-55	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Groups strongly encourage BLM to include a more robust cumulative impacts analysis in its final EIS, focusing both on including more detail about the reasonably foreseeable actions as well as additional analysis of the impacts of those actions. While Groups recognize that BLMs proposed action covers 28 million acres which may make specificity difficult in some respects, for the agency and the public to have an accurate understanding of the complete impacts that are likely to occur from lifting the withdrawals, a more detailed analysis of the cumulative impacts is required. BLM has sufficient information about the projects and impacts to include a more detailed analysis now.	See response to comment 14641-51.	N
14641-56	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild	Additionally, BLM's maps are incorrect. The map of the Bay Planning Area shows no reasonably foreseeable future actions. But Table 3.1-6 lists various projects as being in the Bay Planning Area, including the Donlin Gold Project, the Pebble Mine, road maintenance, rights of way, contamination clean up on ANCSA lands, and conveyances. For the other four planning areas, the maps do not show the locations of activities that are common to all planning areas: road maintenance, rights of way, contamination clean up on ANCSA lands, and conveyances to ANSCA and the State. These should be fixed in the final EIS.	The Donlin Gold Project is shown in EIS Figure 3.1-7, Reasonably foreseeable actions in the Bering Sea-Western Interior planning area. EIS Figure 3.1-6, Reasonably foreseeable actions in the Bay planning area, was updated to show other RFAs in the planning area.	Y

Cumulative					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
	Arce, Patrick Lavin, David Krause	Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League			
14706-1	Melanie Bahnke	Kawerak, Inc.	<p>When you consider the Environmental Impact Statement I think there are some things that also should be factored in. You can't just look at these lands in isolation. Where we're located at is the choke point for shipping through the Bering Strait regional of Alaska, the Arctic shipping lane.</p> <p>And we've got other pressures besides opening up lands. Removing protections from the lands. We've got increased shipping going on. We've got climate change. We just had a typhoon. Our fish are in decline. The caribou -- we're hoping that they continue to migrate through here -- but our hunters are having to travel further and further every year to harvest caribou.</p> <p>The port that's going to be coming, the Port of Nome and the potential for the Graphite One opening up is going to put some pressure, socially, economically on Nome.</p> <p>We already have a housing crisis. When the State of Alaska opened up the offshore claims it didn't consider the impact to -- to Nome, socially, economically, in terms of what it would do to the housing situation here. And so we're in the midst of a real housing crisis.</p> <p>And so I don't know that your Environmental Impact Statement looks at things holistically. It's looking at what possibly could happen on these very specific points on a map if the restrictions are lifted, but I encourage BLM to look at more holistically all of the challenges that we're facing.</p>	<p>Climate change, the Port of Nome, and the Graphite One Mine are identified as reasonably foreseeable trends and planned actions in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions. Thus, they are considered in the affected environment and cumulative impacts analysis for each resource.</p> <p>Existing declines in fish populations and changes in caribou herd distribution and abundance are existing conditions (and reasonably foreseeable trends) that are described in EIS Section 3.7, Fish and Aquatic Species, and EIS Section 3.15, Terrestrial Mammals.</p> <p>Revocation of 17(d)(1) withdrawals would not impact marine areas; thus, offshore development was not analyzed.</p> <p>The Final EIS notes that housing in some communities in rural areas are in limited supply in Section 3.12.1.1.1, Community Facilities, Services, and Infrastructure.</p>	Y
14719-1	Grant Fairbanks		Finally, these (d)(1) lands we're talking about today are partially located in the Kuskokwim mercury belt, and many past and future mines in the area run in the mercury disposal properties in the inner area where mercury in our fish is a very big problem.	See response to comment 14604-1.	Y
14765-1	Emerie Fairbanks-Diehl		Finally, these (d)(1) lands we are talking about here today are partially located on the Kuskokwim mercury belt, and many past and future mines in the area run into mercury disposal problems. And in an area where mercury and fish is a big problem already.	See response to comment 14604-1.	Y
5681-1	Sherman Sparks		<p>I am writing to you to oppose the lifting of the protections of Alaska's D-1 Lands and to oppose opening up these lands to industrial development. Opening up these lands to yet more development will fragment and disturb communities of migratory birds and animals. It will have a harmful effect on salmon spawning grounds. It will place even more stress on native wildlife communities that are already so stressed by climate change, which is happening faster in the Arctic than any place on Earth.</p> <p>I am urging you to manage Alaska's public lands to protect its rich biodiversity and not for yet more extractive development.</p>	See response to comment 14641-40.	Y
5775-2	Lydia DeGross		Please, keep these ecosystems protected to maintain biodiversity, act as a buffer against climate change, and sustain Alaska Native Tribes' way of life!	See response to comment 14641-40.	Y
609-1	Bob Standish		The drinking water and wildlife that we depend on at my remote cabin in Southwest Alaska has been threatened the last 10 years from the huge proposed PEPPLE MINE. Thankfully, in 2023, EPA halted the permitting process for this destructive mine. The toxic chemicals resulting from commercial mining operations and other developments not only affect the immediate area where the operation is occurring, but can travel downstream hundreds of miles to affect and "kill" entire watershed ecosystems.	Pebble Mine is identified as a planned action in EIS Table 3.1-6, Reasonably Foreseeable or Planned Action in or Near the Decision Area. Thus, it is considered in the affected environment and cumulative impacts analysis for each resource.	N
6179-1	Paula Halupa		I ask you to make the right decision - keep protecting Alaska's BLM D-1 lands so that biodiversity can be retained. If D-1 protections are removed and the lands become open to industrial development, some of the best, last intact habitat remaining would be destroyed, degraded, and fragmented. This would have the devastating effect of disrupting migratory corridors for large mammals and birds and impacting critical salmon streams that nourish entire watersheds.	See response to comment 14641-40.	Y
9833-1	Becky Long		The No Action alternative for the D-1 lands around the Devils Canyon, Susitna River ensures the lands won't go to state ownership and management. State ownership would be an impetus for them to push through a risky Susitna dam project(s). This project idea would be harmful. Methane and other greenhouse gas emissions would be released by the development. Such a project would negatively impact the whole Susitna River watershed. This project is not a renewable energy project and must be permanently off limits.	See response to comment 13851-3.	N
9983-3	Gary Harrison	Chickaloon Moose Creek Native Association, Inc.	CHIEF GARY HARRISON: The cumulative impacts that he's talking about, there's a lot of cumulative effects that are out there right now.	EIS Table 3.1-6, Reasonably Foreseeable or Planned Action in or Near the Decision Area, lists all the future actions considered in the affected environment and cumulative impacts analysis for each	N

Cumulative					
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			<p>For instance, when they put out here -- a new platform out here to drill in the inlet they say, "Well, these effects here aren't -- aren't going to do anything." But they don't put the cumulative effects of all of the platforms out there. They don't put in the cumulative effects of all of the destruction that the city -- city -- city does. It doesn't put in the cumulative effects of the waste that comes out of the city and flows right out into the inlet. It doesn't put in the cumulative effects of all of the boats that are out there now. It doesn't put in the cumulative effects of all of the ballast transfer that's been done and will be done in the future. And we can just move that right on into land, and look at all of the cumulative effects of what's happened here.</p> <p>For instance, they say, "Well, this piece of road here isn't going to hurt anything," because we only have one culvert that's messed up for the salmon. Well, if you take the cumulative effects of every piece of road that's up and down this highway, you don't take in the -- those effects. Don't take in the cumulative effects of all of the animals that transfer around.</p>	resource. EIS Table 3.1-5, Past and Present Actions by Planning Area, lists past and present actions considered part of the affected environment for each resource.	
9993-1	Mike McQueen		<p>We fish extensively around the Copper River Basin and other places in Alaska. I think my concerns with this are cumulative impacts and what's happening on the state lands. The recent state modifications to their plan for our area are not, I would say, conducive to conservation. The state seems to be heading in a direction of exploitation, use, sales. They've done a lot of that here. And they're proposing around Klutina Lake to dispose of lands for sale for development. They've done that around the other lakes in this area -- Lake Louise. They're also proposing that for Tazlina Lake, the north end, Tazlina. And none of those things really speak to the health of our salmon run, which is the brand that this area is known for worldwide. I mean, you've got Copper River salmon. And so I would say I would really encourage the BLM to take a hard, hard look at their cumulative impacts.</p>	See response to comment 10116-2. As described in EIS Section 3.1.1, Analysis Methods and Assumptions, "the analysis assumes that lands that would remain under Federal management would have more stringent requirements and restrictions and would therefore experience fewer impacts from development than those from development on lands that are conveyed to the State."	N

Economics					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10116-11	–	Alaska Wilderness League	<p>3.5 Economics There needs to be more analysis and discussion of other industries and wide ranging economic dynamics of the current economy and what potential changes would result from transferring large tracts of land from federal to state ownership. (Recalling my comments from above that a full transfer of the acreage of 17(d)(1) lands is equivalent to the total acreage of Iceland.) Mining is one of the major sectors of Alaska's economy, (mining is covered in section 3.5.1.1.2) but there are other major economic sectors in Alaska, which need to be addressed in this DEIS. Although this section of the DEIS does mention Tourism, it does not consider nor analyze how tourism, fisheries and other major sectors relate to each other, branch, and cascade into other smaller sectors, when one of them undergoes a major shift. The DEIS does not explain how these multiple sectors may be impacted when mining and development is permitted and developed in currently undeveloped areas. During the COVID pandemic, Alaska experienced negative shifts in its economy, when tourism was affected. The health of tourism, fisheries and the other economic sectors have a long reaching impacts across many large and small businesses, large and small communities, state revenues and the quality of life in Alaska.</p>	<p>EIS Section 3.5.1.1, Economics, Affected Environment, discusses the current economic conditions in the potentially impacted regions across the state, including information on different industries or sectors that generate economic activity and provide employment and wages in these regions. This section also describes in more detail the existing oil and gas, hard rock mining, and salable minerals industries in the state as these are the sectors that are likely going to result in changes in economic conditions should development occur if 17(d)(1) withdrawals are revoked. EIS Section 3.5.1.2.2, Impacts Common to All Action Alternatives, further describes potential economic changes in different regions and different sectors resulting from future oil and gas or mining development.</p> <p>As for the other resources, the impacts on recreation are described in EIS Section 3.11, Recreation and Travel Management, and the impacts on fisheries are described in EIS Section 3.7, Fish and Aquatic Species.</p>	N
13406-3	Ashley Wise, Caio Poletti Romano		<p>Furthermore, the adaptability of our business is contingent upon the existence of large, connected landscapes. Climate change impacts have necessitated adjustments to our course areas, such as relocating sea kayak courses from the Harriman Fjord due to glacial retreat and land de-stabilization. The connected, undeveloped landscapes, including D1 lands, have enabled us to adapt and continue our operations, ensuring our participants' safety and our program's longevity.</p>	<p>An additional section was added to EIS - Section 3.5.1.1.4, Recreation Economy, to further acknowledge that for some of the remote regions of the analysis area, the wilderness and pristine nature of the environment (non-use values) can be a significant component of these region's economies. Text also acknowledges that potential future mineral development in the analysis area would diminish these non-use and passive use values, which could impact businesses that rely on these resources. Text was also added to EIS Section 3.11, Recreation and Travel Management, to clarify impacts to recreation.</p>	Y
13486-2	John Strassenburgh		<p>Talkeetna's economy and the lifestyles of local residents are based on an intact natural environment, which supports subsistence; tourism; guiding services for hunting, fishing, and hiking; restaurants, lodges, a myriad of related services, and a trail system that is very popular with residents and visitors alike. Development of these d-1 withdrawn lands would be incompatible with and detrimental to existing land uses and values of surrounding lands, particularly because these d-1 lands are adjacent to or near Parks and our trail system or are adjacent to anadromous waterbodies.</p>	See response to comment 13406-3.	Y

Economics					
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13614-1	Sam Masters	Protect Our Winters	The withdrawal of these leases is crucial for preserving these unique ecosystems and the future of winter and the outdoor state that POW [Protect Our Winters] represents. Protecting these landscapes is not just about maintaining pristine environments; it's about safeguarding the 1 trillion dollar value of the outdoor recreation economy from the impacts of climate change. These lands provide invaluable access for outdoor enthusiasts, supporting lives filled with the love of playing in these spaces.	See response to comment 13406-3.	Y
13766-2	David Jonas	Alaska Homestead Adventures LLC	This land also supports the tourism industry, allowing the public to access to public land as well as supporting jobs that our family relies on. As wilderness guides, our business is directly tied to the existence of pristine wilderness. Opening these lands to mineral extraction would increase pollution, access, noise, and disrupt wildlife, making this area no longer suitable for wilderness guiding.	See also response to comment 13600-18 regarding the potential impacts to recreation, including a decrease in economic benefits due to changes in recreational opportunities.	N
13851-1	Margaret Stern	Susitna River Coalition	<p>The free flowing Susitna River watershed provides a sustained economic benefit to the Upper Susitna region, the Mat-Su Valley and to Alaska as a whole. Cook Inlet and the Susitna Basin contain some of the largest and most valuable salmon habitat and fisheries in the world. The Susitna is home to the 4th largest King Salmon Run in Alaska. The Susitna is one of the largest salmon producers in upper Cook Inlet fisheries, supporting both local communities and Alaska's overall commercial fishing infrastructure.</p> <p>The 10-year average harvest for Upper Cook Inlet is 3.2 million salmon, with an annual average ex-vessel value of \$30 million. Lake and stream systems within the Susitna drainage are key spawning and rearing habitats for much of the Upper Cook Inlet sockeye run, the most commercially valuable of the salmon runs. Roughly half of Alaska's sport fishing occurs in and around Cook Inlet due to the abundance of fish in the Cook Inlet watershed's river systems, of which the Susitna is the largest. Residents and non-residents spend a combined 300,000 angler-days (or days spent fishing by one person) in the Mat-Su Borough, primarily on Susitna tributaries. A study completed for the Matanuska-Susitna Borough by the University of Alaska Anchorage Institute for Social and Economic Research found that spending related to sport-fishing for residents and non-residents generated between 900 and 1,900 local jobs and between \$31 million and \$64 million in personal income for people in the borough.</p> <p>The Susitna watershed nourishes a rich and diverse ecosystem of boreal forest, open tundra, and undisturbed tributaries. It is Alaska's most popular destination for hunters and anglers because of its productive waters and wildlife habitat. In 2017, nearly 11,000 hunted in Game Management Unit (GMU) 10, with over 23,00 animals harvested. Hunting outfitters and guides are reliant upon the health of this abundant and intact ecosystem.</p>	See response to comment 13406-3.	Y
13885-1	Nicholas Patel		Research has shown that unspoiled wilderness can be more economically valuable over the long-term than the extraction of non-renewable minerals for a couple decades. A wild ecosystem is a resource that supports subsistence and commercial activities. It's the lack of extractive industrial activity that allows it to be a resource indefinitely. The long-term costs of building these mines could far outweigh their short-term benefits.	Providing a benefit-cost analysis of future industrial development is outside the scope of the EIS. See response to comment 13406-3.	Y
13952-1	Margaret Tran	Natural Resources Defense Council (NRDC)	If these lands lose protection, it will open sensitive areas like land within the Bristol Bay watershed, which supplies more than half the world's sockeye salmon and supports 15,000 jobs and generates \$2.2 billion annually.	EIS Section 3.5, Economics, describes current economic activities in the Bristol Bay region and the importance of salmon fisheries. The potential impacts on fish resources in the Bristol Bay are described in EIS Section 3.7, Fish and Aquatic Species.	N
14136-1	Loretta Brown	SalmonState	<p>Recreation on BLM lands in Alaska is big business:</p> <ul style="list-style-type: none"> * Recreation on BLM lands in Alaska generated \$53.6 million in FY 2021; * The outdoor industry contributes more than \$1.6 billion to the state's economy and employs 18,878 people annually; * The University of Alaska Center for Economic Development (CED) estimates that in-state consumer spending related to outdoor recreation trips amounts to nearly \$3.2 billion annually; and * In a state with fewer than 1 million residents, the spending noted above creates about 29,000 direct jobs, and 38,100 total jobs through a multiplier effect (indirect and induced). About one job in ten in Alaska is tied to trip-related outdoor recreation spending. <p>Preserving D-1 public lands and waters are vital to Alaska's long-term viability; Alaska's lands under existing protections are invaluable to our clients and businesses. For half a century these lands have supported recreation, hunting, and fishing. These places support internationally famous and productive fish and wildlife habitat, offer unique recreational hunting and angling experiences, create public motorized access, as well as, access for hiking, mountain biking, mushing, mountaineering, world famous backcountry skiing and heliskiing. Alaska is home to experiences</p>	See response to comment 13406-3. See also response to comment 13600-18 regarding the potential impacts to recreation, including a decrease in economic benefits due to changes in recreational opportunities.	Y

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			<p>that our customers from across the globe crave, and we must not allow the lands that support those experiences to be diminished or degraded. Should these protections be lifted and these lands conveyed to the State of Alaska, we risk losing the opportunity to access these lands and therefore a loss in quality of experience, revenue, and potentially employment.</p> <p>The connectivity between these five BLM planning regions and currently designated Wild and Scenic River corridors, Wilderness Areas, and Refuges is imperative to the unique character of these lands in supporting migratory fish and wildlife such as salmon and caribou. Opening these large areas to industrial extraction would have serious negative consequences on our ability to provide high-value recreation opportunities to our clients and would negatively affect our customer base.</p>		
14414-14	Sarah Obed	Doyon, Limited	<p>Doyon notes that it is difficult for stakeholders and the public to meaningfully compare the various alternatives and provide informed comments on the DEIS because the numbers in the DEIS's tables and narratives, in certain instances, do not correspond. For instance, Table 3.5-7 indicates, for Alternative C, a total of 110,000 "Acres where 17(d)(1) Would be Revoked on Lands More Likely to be Developed" and 23,000 "Acres where 17(d)(1) Would be Revoked on Priority Conveyances and Lands More Likely to be Developed. DEIS, p. 3-76. The narrative discussion, however, states: "Under Alternative C, the 17(d)(1) withdrawals would be revoked across approximately 271,000 acres in areas more likely to be developed; of those, 22,000 acres would also be more likely to be conveyed (Table 3.5-7). Future mineral development would increase economic activities, employment, and wages in the potentially impacted regions and generate revenues to local, regional, and State governments." DEIS, p. 3-75. The numbers in the narrative discussions and tables in Alternatives B and D in that section similarly do not line up (e.g., for Alternative D, 155,000 "Acres where 17(d)(1) Withdrawals Would be Revoked on Lands More Likely to be Developed" in Table 3.5-8 vs. statement in the text that "Under Alternative D, the 17(d)(1) withdrawals would be revoked across approximately 361,000 acres in areas more likely to be developed," DEIS, p. 3-78). These are significant discrepancies and impede meaningful and informed comparisons and comment.</p>	The EIS has been updated to address the inconsistency in the text and table values.	Y
14414-15	Sarah Obed	Doyon, Limited	<p>In addition, under the heading "Other Economic Impacts from Future Development, the DEIS states that "Mineral development in the analysis area would diminish the non-use and passive use values as well as the current ecosystem service values." DEIS, p. 3-75. BLM should clarify what it means by "non-use" and "passive use" and if they are not properly "economic impacts," BLM should revise the document accordingly.</p>	See response to comment 13406-3.	Y
14414-20	Sarah Obed	Doyon, Limited	<p>In a section describing "Other Economic Variables," the DEIS includes the statement that: "Additionally, an area may have value even if people do not directly use it or visit it; there is value in knowing it is available to visit or available for future generations." DEIS, p. 3-69. This sentence does not address an "economic" variable. Doyon suggests that BLM delete this sentence or, at a minimum, move it to another section addressing non-economic (and intangible) variables.</p>	As described in EIS Section 3.5.1.1.3, Non-Use or Passive Use Values, non-use and passive values still have economic effects, and thus are included in the EIS.	N
14572-2	Barry Santana		<p>It is also reasonable to expect that hunting and fishing quality and opportunity would be diminished on some of Alaska's most spectacular public lands. Sport fishing, hunting and tourism will be negatively impacted. Commercial fishing in Bristol Bay, Cordova and SE Alaska could be impacted indirectly should large mine development inadequately protect water quality and aquatic species.</p>	See response to comment 13406-3.	Y
14590-1	Denis Ransy		<p>Hunting, and fishing guiding and several other forms of tourism add up to a multi-million industries, throughout the state including D1 lands. These would be badly harmed by industrial development, if not completely eliminated.</p>	See response to comment 13406-3.	Y
14592-1	Tim Richardson	Wildlife Forever	<p>Furthermore, recreation on BLM lands in Alaska is big business: * Recreation on BLM lands in Alaska generated \$53.6 million in FY 2021. * The outdoor industry contributes more than \$1.6 billion to the state's economy and employs 18,878 people annually. * The University of Alaska Center for Economic Development (CED) estimates that in-state consumer spending related to outdoor recreation trips amounts to nearly \$3.2 billion annually. * In a state with fewer than 1 million residents, the spending noted above creates about 29,000 direct jobs, and 38,100 total jobs through a multiplier effect (indirect and induced). About one job in ten in Alaska is tied to trip related outdoor recreation spending.</p>	See response to comment 14136-1.	N
14673-1	China Kantner		<p>One other thing I wanted to say is that I notice in your presentation that there's what I would say is a flawed assumption, that this -- letting all these lands go would bring some kind of economic benefit to our region. I think you should take that out. This -- this is flawed. If you let mining companies come -- come here and set up shop you are damaging a subsistence economy.</p>	See response to comment 13670-2. The type and nature of potential economic consequences of future industrial development (hard rock mining, oil and gas) presented in EIS Section 3.5, Economics, are based on documented economic impacts of industrial development in regions of the state where there have been similar types of development.	N

Economics					
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			And as Ruth said earlier, you're damaging a commercial fishery that's been going strong for over 50 years and provides over a hundred -- I think it's actually quite a bit more than that -- many, many families in this region with income that -- that lasts throughout the year.		
14702-11	Catherine Heroy	State of Alaska	Hunting, fishing, trapping, and other outdoor recreation activities are recognized as drivers for local economies. In 2023, both the House and Senate have considered bills promoting outdoor recreation as drivers for local economic development. The Senate is currently considering the American Outdoor Recreation Act to encourage economic development around outdoor recreation activities on federal lands. Revoking the withdrawals and transferring these lands as intended by Congress provides economic opportunities for hunting and fishing guides in rural communities and other economic opportunities in rural, underdeveloped economies.	See response to comment 13406-3.	Y
14837-1	John Strassenburgh		I just wanted to emphasize that our whole economy up here is kind of depends on an intact ecosystem and subsistence, but also fishing guides and hunting guides and tourists that want to see the wildlife. And I'm just afraid that our basic economy, our local economy, would be seriously impacted. And I think that to varying degrees that that problem exists all over Alaska. That there's there's a lot of local economy that depends on intact ecosystem. And when I see numbers like I do here in in your presentation, and in particularly the subsistence slide, that gives me pause and worries me a great deal.	See response to comment 13406-3.	Y
14838-1	Cody Strathe		Also, there are several business out here that that are trying to make a living off of the way the land is currently. Changing that will pretty much put a lot of us out of business. If we have mining around us, things no one's going to want to come stay at a lodge with a mine right next to it.	See response to comment 13406-3.	Y
9983-2	Gary Harrison	Chickaloon Moose Creek Native Association, Inc.	CHIEF GARY HARRISON: And I would like to add the economic side is not always a benefit. And the people that live there don't generally receive a benefit. All of the mining that's going on here, has it benefitted the original people from here? The answer is no, it has not. The only things it's had is negative benefits. It's killed salmon. It's killed game. It's killed people. I happen to know. My father was one of them. So when we start talking about the negative benefits, I know more about the negative impacts than I do any of the benefits, because we never got any of the real benefits. We never got no economics out of it. We got nothing. They came into our area, took our resources, and left, and we were left with the mess. There was no benefit at all.	The intent of NEPA is to disclose impacts, both beneficial and adverse. Thus, the EIS discloses the types and magnitude of impacts to subsistence access, resource availability, and resource abundance in EIS Section 3.14, Subsistence. The potential impacts to food security and cultural continuity are disclosed in EIS Section 3.12.1.2.2, Social Systems, Impacts Common to All Action Alternatives. EIS Section 3.5, Economics, describes the types and nature of economic consequences of development of oil and gas, hard rock, and salable minerals resources. The information provided is based on documented economic impacts from regions of the state that have experienced similar types of development. In the Northwest Arctic Borough for example, the Red Dog mine has employed local residents, generated high paying jobs in the region, and generated revenues to the Borough and royalty payments to NANA and other ANCs through 7(i) and 7(j) revenue sharing. Oil and gas activities in the North Slope and the Cook Inlet have also generated jobs, income, and local, regional and State government revenues. The EIS, however, also acknowledges that there could be adverse effects of industrial development on subsistence, recreation, fish, and other resources.	N
9991-3	Angela Wade	Chickaloon Village	I would challenge the economic benefits with sustainability. Benefits for how long? Because we've seen it. Like -- like the mine up here I think it ran from 1916 to 1922 is when they pulled out. They changed our whole world for seven years? Six years? Six years. They changed everything for us in not a good way. So when they say these hopeful economic benefits, like, it should be a little bit more sustainable than a flash in the pan for a mining company. That's not economic benefits.	See response to comment 9983-2. Additionally, the duration of the economic impact of industrial development depends on the size of the resource, and the development and production schedule of the operations. EIS Section 3.5.1.2, Economics, Environmental Consequences, describes the type and nature of economic effects that can be expected from oil and gas, and other types of mineral development in different regions of the state. For example, the proposed Graphite One Mine, which is estimated to produce up to 55,350 tons of graphite, is anticipated to generate jobs, income, and revenues associated with its construction and operations activities that would last approximately 28 years. Each project would have a different schedule. Any future development on 17(d)(1) revocations would be subject to their own project-specific environmental review, which would include an analysis of the magnitude and duration of potential economic effects.	N
9995-5	Lisa Wax		The other main point that I'd like to make is just that what we're forgetting, and I very rarely hear talked about -- and I apologize. I don't want to quote the wrong number, but the outdoor -- the tourism recreational industry has just outpaced mining and oil. There was a study that came out very recently, and I apologize, but I would like the quote just to really bring the attention, because I think this is something that we really should be emphasizing is this impact that -- there we go. Okay. Thank you for bearing with me. "The outdoor recreation" -- "Outdoor recreation now contributes more than one trillion to the U.S. economy." And this was published in Novem -- November 21st of 2023. "And U.S. Department of Commerce just released its latest assessment of outdoor recreation industries contribution to the national economy. The result: 1.1 trillion in total economic output during 2022. That's more than oil and gas extraction and mining combined. Nationwide outdoor recreation was responsible for" -- I -- I won't go into all the details. And it does bring Alaska -- let me just come forward to Alaska here since that's our most relevant "To ensure the success is sustainable and our public lands and waters continue to be accessible	See also response to comment 13600-18 regarding the potential impacts to recreation, including a decrease in economic benefits due to changes in recreational opportunities.	N

Economics					
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			to all Americans for generations to come." I apologize. There is -- oh, here we go, "Locally the economic output in jobs provided by outdoor recreation can be even higher in Alaska, Hawaii, Montana, Wyoming, Vermont, and Massachusetts. It's responsible for more than 4 percent of each state's GVP. And it's growing faster than the domestic economy as a whole, the outdoor recreation economy. In -- between '21 and '22 outdoor recreation grew 4.8 percent while total economic group is only 1.9 percent."		
F2-2			Hunting, and fishing guiding and several other forms of tourism add up to a multi-million industries, throughout the state including D1 lands. These would be badly harmed by industrial development, if not completely eliminated.	See response to comment 13406-3 regarding impacts to tourism and recreation.	Y
14842-11	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	The current administration directed in EO 14072 the establishment of the first government-wide natural capital accounts that would measure the economic value that natural assets provide to society and connect changes in nature with changes in economic performance. ²⁰ This new system of Natural Capital Accounts (NCA) will put nature on the nation's balance sheet. The NCA initiative is a measure to conserve and restore nature for the American people, essential to measuring and monitoring our progress. The Service recommends the BLM conduct a NCA analysis to include in the economic section for a comprehensive assessment of gains and losses of natural capital.	See EIS Section 3.5.1.1.4, Recreation Economy, for a discussion of the benefits of tourism on Alaska's local economy. Calculating potential gains and losses of natural capital would be considered at the project-specific level. The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. This EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and new State of Alaska selections under the Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. For this reason, measuring the economic value of natural assets would not add value to the analysis and is not necessary for the Secretary to make a reasoned choice between alternatives.	N
13406-2	Ashley Wise, Caio Poletti Romano		The potential jeopardy of D1 lands poses a significant threat to the sustainability of our programs in Alaska. We refer to these areas as the "lead-instructor" because of how critically they influence educational experiences that shape future leaders. Without the protection of D1 lands, our ability to deliver impactful and meaningful courses may be compromised, affecting not only our students but also the local communities and economies that benefit from our presence.	The Secretary of the Interior has the discretion to select any combination of revocations or retention of 17(d)(1) withdrawals within the range of the analyzed alternatives, including the selection of the No Action Alternative.	No

Environmental Justice					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13211-1	Caitlin Roesler	US Environmental Protection Agency Region 10	The DEIS identifies disproportionate impacts to communities within the project area for all action alternatives. In accordance with EO 14096, in addition to identifying impacts, EPA recommends the FEIS address the disproportionate impacts. The DEIS states that the two primary effects to communities with EJ concerns are the availability of resources to local subsistence users and deflection, displacement, and changes in behavior of subsistence resources. ³ To address these disproportionate impacts, EPA recommends that BLM work closely with the impacted communities to identify mitigation measures to minimize the anticipated impacts on subsistence practices, especially given the very high value of subsistence to local communities and its linkages to health, culture, and way of life. Examples of potential additional mitigation measures to discuss with the impacted communities include: * Regular monitoring and reporting of subsistence resource availability and food security. This may include developing regular harvest and food security surveys to identify the magnitude and extent of impacts on subsistence resources, documenting changes or trends in subsistence use and food security and changes in land use and ownership and working with the community to identify methods for sharing any reports or data with impacted community members. * Addressing loss of subsistence resources that result from BLM's decision, which includes working with communities to identify mechanisms for providing nutritionally equivalent foods or resources that would allow subsistence users to hunt or gather in other locations. Because loss of subsistence foods may require users to purchase nutritionally comparable substitutes, consider use of replace cost method as appropriate to evaluate the monetary cost of replacing subsistence food and identifying appropriate alternate equivalent food resources. * Forming a subsistence advisory group as a potential mechanism for knowledge sharing and to help inform where subsistence users are most impacted.	Mitigation or monitoring would be considered at the project-specific level when a specific project is evaluated under its own separate project-specific environmental review. Section 810(a) of ANILCA requires that an evaluation of subsistence uses and needs be completed for any Federal determination to "withdraw, reserve, lease or otherwise permit the use, occupancy, or disposition of public lands." If the ANILCA 810 analysis finds that a significant restriction remains, Section 810 hearings must be held in the affected communities, and if the significance determination remains following the hearings, the Federal agency may approve or prohibit the action based on whether such a significant restriction of subsistence uses is necessary and consistent with sound management principles for the use of public lands; and whether reasonable steps will be taken to minimize adverse effects on subsistence uses and resources resulting from the action(s). Additionally, as described in EIS Section 3.6.1.2.2, Environmental Justice, Impacts Common to All, all impacts described in the section are disproportionate to the environmental justice communities.	N
14414-16	Sarah Obed	Doyon, Limited	Section 3.6.1.2, discussing Environmental Consequences relating to environmental justice populations, states that "any reduction in subsistence resource availability is considered an adverse and disproportionate impact." DEIS, p. 3-83 (emphasis added). The implications of this	See response to comment 13211-1. As described in EIS Section 3.6, Environmental Justice, environmental justice communities are defined as minority populations or low-income populations.	N

Environmental Justice					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			statement for future activity in Alaska are exceedingly broad; it would effectively mean that any proposed action in Alaska that in any way impacts the availability of subsistence resources which, as reflected in BLMs recent Ambler Road Draft Supplemental EIS, the agency now views very broadly would constitute an adverse and disproportionate impact to environmental justice populations. Congress established a process in section 810 of the Alaska National Interest Lands Conservation Act for agencies to evaluate and address effects of federal actions on subsistence uses and needs. The statement that any reduction in subsistence resource availability is an adverse and disproportionate impact on environmental justice communities is overbroad and should be clarified.	In the case of this project, subsistence impacts would disproportionately affect communities that meet the environmental justice definition.	
14414-17	Sarah Obed	Doyon, Limited	In addition, Section 3.6.1.2 fails to recognize the importance of economic activity and revenue to supporting subsistence activities. Alaska's economy today is a mixed one. While subsistence remains critically important, economic development, and the jobs and other benefits it brings, helps support the ability of subsistence users to continue to participate in subsistence activities, providing resources to purchase and maintain the equipment necessary to engage in these activities. While the DEIS states that Development would increase economic activity and revenue in various regions of Alaska, along with the other impacts already discussed, BLM should add further discussion of the benefits of such development to subsistence use and activities. DEIS, p. 3-83. The DEIS does recognize these benefits in its discussion of cultural continuity and public health: Economic conditions (described in Section 3.5, Economics) also contribute to the overall health of the communities in the analysis area, and to individuals ability to purchase items such as tools, supplies, and fuel to support subsistence activities. Income from employment or dividends from ANCs for shareholders and the Alaska Permanent Fund help some residents maintain their culture and community cohesion. DEIS, p. 3-156. It should also do so in the discussion of environmental justice.	See response to comment 13211-1. As described in EIS Section 3.6, Environmental Justice, the economic benefits from the project would not be disproportionately borne by environmental justice communities. Any beneficial economic ramifications would affect the borough or census area as a whole; thus, they do not meet the criteria for discussion in the environmental justice section.	N
14579-18	Deantha Skibinski	Alaska Miners Association	Section 3.6 - Environmental Justice Analysis This section assumes the only Environmental Justice issue is loss of Federal subsistence priority. This section should also recognize that by not revoking d-1 withdrawals, potential development opportunities are lost that would provide jobs and a tax base for impoverished local communities. The existing Red Dog mine in Northwest Alaska has provided both significant employment and income for many residents of impoverished communities in the region, as well as a substantial tax base (through payments in lieu of taxes) to the Northwest Arctic Borough, tax revenue that provides for better schools and other public services. The mine also provides support to Alaska Native residents statewide through ANCSA section 7(i) and 7(j) revenue sharing provisions distributed to Regional and Village Native Corporations. Oil and gas development in the North Slope Borough has provided decades of tax revenue to support schools and public services in local communities.	See response to comment 14414-17.	N
14702-26	Catherine Heroy	State of Alaska	Appendix F/Table F-2; page 4, it seems data is missing from this table. Haines is in the table, but Chilkat/Klukwan has not been included in the table. Please add Chilkat/Klukwan to the table.	Klukwan was determined to be an environmental justice community and therefore is listed in EIS Appendix F, Table F-1, Environmental Justice Communities that Overlap with 17(d)1) Withdrawals in the Ring of Fire Planning Area, not Table F-2, Communities Determined to Not Have Environmental Justice Classifications that Overlap with 17(d)1) Withdrawals in the Ring of Fire Planning Area.	N

Request for Comment Period Extension					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10022-1	Theresa Clark	Yukon River Intertribal Watershed Council	And I'd also like to request that BLM consider extending the public comment period. You released this in the middle of January. Your -- or middle of December, and you're taking comments until the middle of February -- through the holidays. You also just got finished with the EIS on the Ambler Road, and so a lot of people were working on that.	Per 40 CFR 1506.11(d), NEPA requires at least 45-day comment period. The comment period for the EIS exceeded that minimum by 15 days when it provided 60 days for public comment. Tribes and ANCs may request consultation at any point during the NEPA process, including after the comment period has closed.	N

Request for Comment Period Extension					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
11426-3	–	Alaska Wilderness League	I request an extension in the public comment period AND the placement of large format paper maps illustrating the alternatives along with printed copies of the EIS and associated appendices in each impacted community in an accessible public space -- tribal government offices, local government offices, community or school libraries, BLM offices -- so that residents of those communities without computers and high speed internet have access to them. Although the ANILCA 810 analysis and hearing location focused on rural communities, this list of impacted communities provided with access to printed copies of the various EIS documents should also include nonrural communities such as Valdez, where residents might recreate on the BLM-managed public lands. The clock on the public comment period extension should start only when these materials are physically available in printed form in the communities and should last for at least 30 days from the availability of the information. The news about the extension and where the public can access the EIS documents should be widely publicized.	See response to comment 10022-1. Hard copies were made available at public repositories in hub communities, and additional hard copies of the EIS were provided at public meetings that did not already have them available. Jump drives were provided at the public meetings for people to take home, which included all the maps for the EIS.	N
14052-1	Tisha Kuhns	Calista Corporation	REQUEST FOR CONSULTATION AND 90-DAY EXTENSION OF COMMENT DEADLINE Calista encourages the BLM to continue engaging in meaningful consultation with Tribes and ANCs on the potential revocation of ANCSA 17(d)(1) withdrawals as required by DOI Policy, Executive Order 13175 and applicable federal statutes. We would also like to ask for a 90-day extension to the comment period so that all of the 56 Tribes and 45 Village Corporations of the Y-K Region have ample time to review the large EIS and provide meaningful comments.	See response to comment 10022-1	N
14578-1	Kim Reitmeier	ANCSA Regional Association	ARA respectfully requests that BLM extend the public comment deadline for the proposed "ANCSA 17(d)(1) Withdrawal EIS" beyond the initial 60-day extension and complete a full 90-day process for the comment period that opened December 15, 2023.	See response to comment 10022-1	N
14579-25	Deantha Skibinski	Alaska Miners Association	This issue has a long and complicated history and has long-term implications for vast areas of Alaska. It is unreasonable to expect the public or interest groups to review the 1090-page document in 60 days. The draft was released only a few days before the Christmas and New Year's holidays, when many of our potential reviewers are focused on family and social engagements. In addition, the draft review period coincided with comment deadline on for several other federal issues -including the Ambler Road SEIS.	See response to comment 10022-1. The Ambler Road SEIS comment period ended December 22, 2023. The comment period for the EIS ended February 14, 2024.	N
14580-1	Joe Bovee	Ahtna, Inc.	we are requesting an additional 30-day extension be added to the public comment period through mid-March 2024	See response to comment 10022-1	N
14603-2	Tisha Kuhns	Calista Corporation	We would also like to ask for a 90-day extension, so that all of the Tribes and Village Corporations have ample time to review the large EIS and provide meaningful comments.	See response to comment 10022-1	N
14630-1	Emily Johnson	National Park Service	We also recognize that NPS declined the opportunity to be a cooperating agency; however, as a result of the breadth of this analysis and the potential for impacts on a near statewide level, we formally request: 1) an additional 30 days or more to submit comments on this DEIS	See response to comment 10022-1	N
14681-44	Emily Johnson	National Park Service	NPS understands that the final EIS will include feedback from the public hearings; however, we have noticed that rural subsistence users were often hearing the information on the D-1 withdrawals for the first time at the RAC, SRC and public meetings. The NPS is concerned that they may not have had the full detail to understand how their communities may be affected. Our understanding is that the rural public was not provided with hard copy detailed maps and rather were instead directed to the BLM website to view maps. Most/many rural subsistence households do not have access to a computer, internet, or high-speed internet to access and download such large documents. The NPS, on behalf of rural communities, requests an extension to the comment period to have more time to access information and draft informed recommendations.	See response to comment 10022-1.	N

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
12797-1	Sommer Caudill		My concern is the already diminishing salmon numbers and habitats that are connected with Alaska's ecosystem. With more interference with mining, risk not just the area but connected by salmon statewide. Many villages suffered no fish all across the Yukon River etc and was not able harvest and stock. If we as people are feeling the hardship then so is the foodchain/ecosystem. It	Declining Pacific fish stocks are described in EIS Section 3.7.2.1, Fish and Aquatic Invertebrate Populations, Affected Environment. Impacts to subsistence users and resource abundance and availability are described in EIS Section 3.14, Subsistence.	N

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			should be a balance and it is disrupted- why add more imbalance to such a sacred necessity to this whole state?		
13340-4	Shannon Donahue	Rivers Without Borders	The Chilkat River chinook salmon run failed to meet escapement goals seven times between 2012 and 2022 and has been designated as a Stock of Concern by ADFG since 2017. While chinook are under pressure from multiple factors, retaining D1 protections helps to conserve important habitat for Chilkat chinook and other species of salmon. With so many factors beyond our immediate control and realm of influence, the BLM should take action to protect salmon within its realm of influence by retaining D1 protections.	Text was added to EIS Section 3.7.2.1, Fish and Aquatic Invertebrate Populations, Affected Environment, describing the State of Alaska's stocks of concern.	Y
134-1	Martha Neuringer		At least 5000 miles of salmon-bearing streams, including critical habitat for five species of Pacific salmon, which are a foundational ecological species and provide a major food source for Native Tribes as well as many other species of wildlife.	EIS Section 3.7.1.1, Affected Environment, and EIS Section 3.7.2.1, Affected Environment, describe the aquatic habitat and fish species in the analysis area that may be impacted by revocation of 17(d)(1) withdrawals, including anadromous streams. No Federally designated critical habitat for fish occurs in the decision area.	N
13486-1	John Strassenburgh		One of these withdrawals is immediately adjacent to a Matanuska Susitna Borough Park. Several of these are adjacent to or straddle anadromous streams, including Question Creek, Pruass Creek, and Answer Creek. Other nearby d-1 parcels abut the Susitna River, which supports all five species of Pacific Salmon.	EIS Section 3.7.1.1, Affected Environment, and EIS Section 3.7.2.1, Affected Environment, describe the aquatic habitat and fish species in the decision area that may be impacted by ANCSA 17(d)(1) withdrawals, including anadromous streams.	N
13486-3	John Strassenburgh		The Susitna River contains all five species of Pacific salmon, grayling, rainbow trout, burbot, dolly varden, and lake trout. This includes King (i.e., Chinook) salmon. This is a prize fish, but unfortunately it is a highly stressed species. The Kings are physically smaller than in they were 10 or 20 years ago, and their numbers are dramatically declining.	See response to comment 13486-1. Additionally, declining Pacific fish stocks are described in EIS Section 3.7.2.1, Fish and Aquatic Invertebrate Populations, Affected Environment.	N
13600-12	Jen Leahy	Theodore Roosevelt Conservation Partnership	Fish in the decision area are an important resource for subsistence harvesters, recreational anglers, and fishing-based businesses. While the TRCP appreciates the effort demonstrated to analyze the potential direct impacts of revoking the D-1 withdrawals to anadromous streams and rivers in the draft EIS, the final EIS should more clearly acknowledge that habitat degradation can have disproportionately large impacts on salmon populations (Schindler et al. 2010).	Text was added to EIS Section 3.7.1.2.2, Impacts Common to all Action Alternatives, to clarify impacts to salmon.	Y
13600-13	Jen Leahy	Theodore Roosevelt Conservation Partnership	The final EIS should also include a more robust discussion of the potential adverse effects of industrial roads and mines on water quality and fish if the D-1 withdrawals are revoked. The draft EIS fails to cite relevant scientific literature that was included in the BLM's Ambler Road draft SEIS in 2023. In addition to those studies, we recommend adding a recent analysis (Lubetkin, 2022) that compared predicted versus actual spills of hazardous materials at the five largest mining operations in Alaska and found that mining project proponents severely underestimated spill risk when seeking federal and state permits.	The subject matter experts considered the study (Lubetkin 2022) and it is now referenced in EIS Section 3.7.1.2, Fish and Aquatic Species, Environmental Consequences. The EIS does not estimate the frequency of spills; that would occur at the project-specific level. As described throughout the EIS, the action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State of Alaska's top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually.	Y
13600-14	Jen Leahy	Theodore Roosevelt Conservation Partnership	The draft EIS states that multiple priority conveyances immediately adjacent to the Gulkana River could negatively impact steelhead trout (identified by the BLM as a sensitive fish species) in that river if the withdrawals are revoked, but the draft EIS does not mention the potential concurrent impacts to resident rainbow trout. Anadromous steelhead and resident rainbow trout are closely related, and resident and anadromous parents can produce offspring of both varieties. Therefore, the final EIS should extend the potential adverse impacts on Gulkana steelhead to resident rainbow trout as well. Both species are prized by recreational anglers for catch-and-release fishing, although Gulkana steelhead are far more elusive. According to the Alaska Department of Fish & Game, the Gulkana is home to the most northerly native population of rainbow trout in North America.	Text was added to EIS Section 3.7.2.1, Affected Environment, to clarify that any discussion of steelhead trout also applies to rainbow trout.	Y.
13614-2	Sam Masters	Protect Our Winters	Alaska's BLM-managed D-1 lands, covering 50.1 million acres, comprise 13 percent of the state and boast some of the nation's largest remaining intact ecosystems. From high alpine tundra to pristine estuaries in places like Bristol Bay, these landscapes are home to the world's most abundant wild sockeye runs, supporting migratory birds and roving herds of caribou. The undisturbed watersheds deliver the cold, clean water essential for wild fish to withstand the impacts of accelerating climate change.	See response to comment 13379-5.	N
13628-20	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	We believe the direct and cumulative impacts analysis of Alternatives C and D to fish and aquatic systems in the DEIS should include more discussion of potentially degraded water quality from increased extractive development such as hard-rock and placer mining, and their supporting transportation corridors. We are concerned that BLM's excellent conclusions from scientific literature about mining water quality impacts cited in the Ambler Road DEIS (BLM 2023) were not	See response to comment 13265-1.	N

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			<p>included in this analysis. For example, BLM stated "Impacts on water resources quality may include increased dust from mining operations, potential spills, and containment of ore concentrates, chemicals used in processing ore, fuels, and process water, in addition to wastewater from operations of facilities and camps, and may require treatment of mine water in perpetuity (BLM 2023 p. 3-44); and, "Direct and indirect chemical stressors such as mining related pollution, acid mine drainage, and the release of toxic materials have the potential to impact the health and survival of fish populations and other aquatic species [Limpinsel et al. 2017] (BLM 2023 p. 3-105).</p> <p>The consequences of expanded D1 Withdrawal revocations in Alternatives C and D that may eventually cause increased intensity of mining, and increased potential long-term cumulative and reasonably foreseeable impacts, are not adequately addressed and they should be. We encourage BLM to include a cogent discussion of the known significant and long-term impacts to water quality and contaminant effects on fish and aquatic systems from mining. Many of these impacts from mines, particularly acid rock drainage and heavy metal leaching from tailings and waste rock disposal, are unavoidable and often require perpetual treatment (Limpinsel et al (2018), Woody and O'Neal (2020), and Sergeant et al. 2022). BLM should disclose the established poor water quality track record of large mines in the US (Maest et al. 2006), and specifically in Alaska (Earthworks 2020) because continuation of this track record is likely with expanded mining in the revocation areas.</p>		
13631-3	Mark Anderson, Jan Crichton		<p>The old growth forests and natural watersheds provide successful conditions for new generations of young salmon that will support our Southeast commercial fishing industry.</p> <p>These lands support all 5 species of wild samon, which are under extreme stress form ocean by-catch, degraded watersheds, toxicity from Canadian mines near headwaters, and global warming, which warms the streams, especially where logging has occurred, and makes young salmon rearing less successful.</p>	EIS Section 3.7.1.1, Freshwater Aquatic Habitat, Affected Environment, and EIS Section 3.7.2.1, Affected Environment, describe the existing conditions of aquatic habitat and fish stocks in the analysis area, including those described in the comment.	N
13755-2	Leigh Honig on behalf of Bristol Bay Subsistence Advisory Council	Bristol Bay Subsistence Regional Advisory Council	The Council has numerous concerns over the health of salmon runs in the region. A number of salmon stocks have failed to reach sustainable goals, including several stocks that have been severe enough to be designated stocks of management concern. These diminished returns are having widespread implications for the district and the fisheries.	Text was added to EIS Section 3.7.2.2.2, Impacts Common to All Action Alternatives, regarding ADFG's stocks of concern.	Y
13766-1	David Jonas	Alaska Homestead Adventures LLC	We have not been able to harvest salmon since 2020. A lot of these species are already under stress from climate change and could not handle the habitat fragmentation from development being proposed.	Additional text regarding the importance of habitat connectivity and potential impacts to it from revocation of ANCSA 17(d)(1) withdrawals was added to EIS Section 3.7.2.1.7, Cumulative Impacts.	Y
13790-5	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	<p>With regards to Copper River salmon, the Native Village of Eyak (NVE) provided the BLM with data and reports pertaining to Chinook and sockeye run-timing and spawning distribution in August 2023. This report included radiotelemetry data that detailed spawning distribution and highly productive streams within and adjacent to 17(d)(1) lands. This could have an adverse impact on Copper River salmon, particularly Chinook, that are already at low abundance and have failed to reach escapement goals 4 out of the last 10 years. None of this information was included in the draft Environmental Impact Statement.</p> <p>The omission of this data is irresponsible and threatens subsistence. We would like an explanation as to why this invaluable information was not considered in the EIS.</p>	See response to comment 14257-1. Additionally, tables were added to EIS Section 3.7, Fish and Aquatic Species, to summarize impacts by hydrologic unit code (HUC).	Y
13804-1	Elsa Sebastian		I am especially concerned for the loss of D-1 status for the lands closest to my home in Haines Alaska. The headwaters of watersheds important to salmon are in Chilkat area D1 lands, and some of the lands currently held in D-1 status would see mining exploration if the D-1 protections were lifted.	EIS Section 3.7.1.2.2, Impacts Common to All Action Alternatives, describes impacts to aquatic habitat from potential mining activity.	N
13890-2	Bill Kane	Igiugig Village Igiugig Village Council Igiugig Native Corporation	<p>The Bristol Bay ecosystem in Alaska comprises one of the most remarkable regions of ecological intactness and resilience worldwide, especially notable for its critical role in supporting the world's largest sockeye salmon populations. This intactness - the preservation of a landscape relatively untouched by industrial development - provides a complex mosaic of habitats that are essential for the lifecycle of sockeye salmon. The unique ecological characteristics of Bristol Bay allow its salmon populations to leverage diverse habitat types, which is key to their ability to withstand environmental variability and climate change. This singular ecosystem demonstrates the profound importance of intact habitats for the sustainability of natural populations and broader ecological health.</p> <p>The intactness of Bristol Bay's ecosystem underpins its resilience to environmental variability. Sockeye salmon, in particular, benefit from the ability to use different habitats that may be variously affected by year-to-year climate oscillations. For instance, some rivers or lakes may experience higher temperatures or altered flow patterns in a given year, but the presence of numerous alternative habitats within the ecosystem provides a buffer that can mitigate the impact</p>	Additional text regarding the importance of complex, intact habitats was added to EIS Section 3.7.2.1.7, Cumulative Impacts.	Y

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			on the overall salmon population. This spatial heterogeneity in habitat conditions allows sockeye salmon to "hedge their bets" in a changing environment, supporting stable population dynamics even in the face of significant climate variability (Brennen et al. 2019).		
13890-3	Bill Kane	Igiugig Village Igiugig Village Council Igiugig Native Corporation	The effects of climate change, including warmer temperatures, altered precipitation patterns, and increased frequency of extreme weather events, pose a significant threat to ecosystems worldwide. However, the diverse and intact habitats of Bristol Bay offer a degree of insulation to sockeye salmon populations. By providing a range of environmental conditions across the ecosystem, these habitats enable sockeye salmon to find suitable conditions for spawning, rearing, and migration, even as some areas become less hospitable due to climate change. This adaptability is crucial for the long-term sustainability of the salmon and the relations that depend on them. To date, regional salmon habitat monitoring efforts likely significantly underestimate the long-term importance of individual habitats due to the natural variability and asynchrony among salmon populations (Davis and Schindler 2021).	See response to comment 13890-2.	Y
1399-2	Wanda Culp		SOI-BLM Alaska region's obligation to ANCSA D-1 lands includes an abundance of biodiversity found in very few places remaining in the U.S. or globally. Removing ANCSA D-1 protections for further access to American-owned public lands in the 49th state for industrial development is not in Alaska Native or Public Interests. These types of "special" outside large-scale business-interests will continue the harmful fragmentation impacts of Alaska's intact landscapes by negatively affect migratory corridors for large mammals, and birds with heavy impact on important - threatened - salmon rivers and streams that nourish entire watersheds.	See response to comment 13890-2.	Y
14043-2	Erin Dougherty Lynch	Native American Rights Fund on behalf of the Bering Sea Elders Group	In the Yukon-Kuskokwim and Bering Strait regions, these lands, now managed by BLM, are subsistence use areas or critical habitat for important subsistence species, such as salmon bearing streams. Lifting D-1 protections has the potential to fragment and diminish important habitat.	See response to comment 13890-2.	Y
14044-1	Joanna Cahoon	Trustees for Alaska	The DEIS should clarify impacts to aquatic resources between alternatives. The DEIS qualitatively considers the most obvious effects of activities on fish and aquatic invertebrates that could likely occur as a result of transfers of BLM lands to the State of Alaska. The validity of the assessments is questionable for several reasons. Potential effects are expressed through a relative comparison of the alternatives. However, understanding the potential impacts is difficult because of inconsistencies in the logic used. For example, the EIS states in Table ES-1 (Summary of Impacts Identified in the ANCSA 17(d)(1) Withdrawals Draft Environmental Impact Statement) (p. ES-10). that Alternative B "...would largely avoid impacts to fish or aquatic invertebrate populations." It goes on to say that Alternative B could impact the Gulkana River steelhead trout, a BLM sensitive species, because "multiple priority conveyances are immediately adjacent to the Gulkana River. Alternative B is not anticipated to have impacts on the other BLM sensitive fish species (Kigluaik Mountains Arctic char) because this species does not occur on or immediately downstream from the revocations." For Alternative C, "... the impacts on fish and aquatic invertebrate populations would be the same as Alternative B but to a greater magnitude and extent." and that three BLM sensitive species could be affected. Alternative C "...could impact up to three BLM sensitive fish species (Alaskan brook lamprey, Kigluaik Mountains Arctic char, and Gulkana River steelhead trout) because multiple priority conveyances include suitable habitat or are immediately adjacent to the Gulkana River.". Assessment of Alternative D states that it "...would have similar impacts to fish and aquatic invertebrate populations as Alternative C but to a larger extent and magnitude because more miles of stream and acres of lakes and ponds occur on 17(d)(1) withdrawals that would be revoked." and that three sensitive BLM species could be affected. Three BLM sensitive fish species (Alaskan brook lamprey, Kigluaik Mountains Arctic char, and Gulkana River steelhead trout) affected in Alternative C would also be affected because "...multiple priority conveyances include suitable habitat or are immediately adjacent to the Gulkana River.". The relative comparison of the alternatives is difficult to understand. What does it mean that Alternative C or D can have "similar" impacts as another but to a "larger extent and magnitude" when the alternative used for comparison, B, "...would largely avoid impacts to fish or aquatic invertebrate populations."? If Alternative B "...would largely avoid impacts to fish or aquatic invertebrate populations." then what is a greater magnitude and extent of no or little impact - avoiding impacts to a greater extent? If Alternative C has the same effects as Alternative B, to largely avoid impact, but with a greater magnitude and extent wouldn't Alternative C be better than Alternative B? This is awkward wording and makes it difficult to impossible to clearly understand the potential effects of the alternatives. This analysis is also inconsistent with assessment presented later in the document. As an example, it is stated (Section 3.7.2.2.4 P. 3-95) that "Alternative C, the impacts on fish and aquatic invertebrate populations would be the same as Alternative B, which is to largely avoid impacts, but to a greater magnitude and extent because more acres of fish and aquatic invertebrate populations could be affected in the focused analysis area (see Table 3.7-6). Then it is stated that "Alternative C would also have more impacts to fish and aquatic invertebrate populations than Alternative B	Added clarification to EIS Section 3.7, Fish and Aquatic Species, where text stated effects would be the same or similar that this is referring to the types of impacts. The EIS text explains that magnitude and extent changes would be "because more miles of stream and acres of lakes and ponds occur on 17(d)(1) withdrawals that would be revoked". Habitat impacts are quantified for comparison among alternatives in the tables throughout EIS Section 3.7.1.2, Environmental Consequences.	Y

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			because it would revoke 17(d)(1) withdrawals in high-value watersheds, including those used by BLM sensitive fish species." (Section 3.7.2.2.4 P. 3-95). These two sentences are not logically consistent. This and the issue in the previous paragraph need to be addressed so that the assessment of the effects of the alternatives is logical.		
14044-2	Joanna Cahoon	Trustees for Alaska	The DEIS should expand the analysis of effects on sensitive species The description of the potential effects on the BLM sensitive species is confusing. The potential effects are all tied to the amount of activity that would occur in the Gulkana River. For example in Alternative C, it states that the three BLM sensitive fish species (Alaskan brook lamprey, Kigluaik Mountains Arctic char, and Gulkana River steelhead trout) would be affected "because multiple priority conveyances include suitable habitat or are immediately adjacent to the Gulkana River.". This suggest that all three Sensitive Species occur here, which is not true. This should be corrected.	EIS Section 3.7.2.2.4, Alternative C, was edited to clarify impacts.	Y
14044-3	Joanna Cahoon	Trustees for Alaska	The DEIS underrepresents the potential adverse effects of roads and mines on aquatic resources under the alternatives. The DEIS is incomplete in its consideration of potential effects from proposed transfer of varying amounts of U.S. Bureau of Land Management (BLM) lands to the State of Alaska and the resulting changes in land management and development that would likely occur. The effect of roads and mines are a good example of this. Consideration of roads in the EIS is limited and not comprehensive, thus likely underrepresenting potential impacts. Roads and their associated infrastructure (e.g., culverts) can block or impede access to needed habitat (Trombulak and Frissell 2000). Road corridors can serve as important invasion routes for nonnative species, especially nonnative plants (Gonzalez-Moreno et al. 2015, Menuz and Kettenring 2013), and climate change is likely to favor continued expansion of nuisance and harmful exotic herbaceous species in watersheds (Coffin et al. 2021). Roads can increase access to previously isolated fish populations and intensify harvest. Native fish populations in previously inaccessible areas are often vulnerable to even small increases in fishing effort (Trombulak and Frissell 2000). Roads can alter access to floodplains, which are critical habitat for a number of life-history stages of many species of the potentially affected fish (Tockner and Stanford 2002; Jeffres et al. 2008). They can also exacerbate the effects of floods by impeding the ability of floodplains to dissipate to reduce the potential of high water to scour the streambed and increase the mortality of developing eggs and embryos (Goode et al. 2013; McKean and Tonina 2013). Such effects are expected to increase in the future as climate changes alters hydrographs in Alaska (Sloat et al. 2017). Similarly, the consideration of effects from mines is not complete - for example hydrological impacts are not discussed. Refer to Sergeant et al. (2022) for a comprehensive review of potential impacts of mines and mining operation. Mine impacts will also likely extend to portions of the landscape that are currently glaciated and reduce the potential for use of these areas by salmon and other native fish as the climate warms (Moore et al. 2023). The EIS should be more comprehensive in its consideration of the potential impacts of road and mines.	EIS Section 3.7.1.2.2, Impacts Common to all Action Alternatives, was edited to provide additional detail on the impacts from roads and mining activity.	Y
14044-4	Joanna Cahoon	Trustees for Alaska	The DEIS should consider the landscape and watershed level effects of the alternatives on habitat and fish and other aquatic resources. A major shortcoming of this DEIS is its failure to acknowledge and consider the potential landscape and watershed level effects on fish and other aquatic biota, particularly biodiversity and population portfolios. Biodiversity is the intraspecific variation, genetic and phenotypic, of local populations (Des Roches 2021). It is key to promoting stability and the long-term persistence and productivity of populations and species (Schindler et al. 2010) and meeting challenges such as a changing climate (Des Roches et al. 2021). The variability and productivity of local populations is key to the persistence of a population (Schindler et al. 2010) and their response to disturbance and environmental variation (Brennan et al. 2019). Human modification of the landscape is the predominant cause of biodiversity loss (Des Roches et al. 2021) by reducing or eliminating the segments of populations (Davis and Schindler 2021, Munsch et al. 2022, Price et al. 2023). Fragmentation, the elimination of or reduction of access to what may be presumed to be even a relatively small proportion of the total available habitat, could reduce biological diversity and resilience (Haddad et al. 2015, Hanski, 2015) and increase extirpations (Crooks et al. 2017). These effects can last for decades and compromise a population's ability to respond to future changes (Bouska et al. 2022, Munsch et al. 2022, Leppi et al. 2022). Failure of the DEIS to consider this likelihood significantly underestimates the effect of the various alternatives. Specific to the Gulkana River steelhead trout, the assessment is incomplete because it fails to consider potential concurrent impacts on resident rainbow trout. Steelhead are the anadromous life-history type, not a species or subspecies, of <i>Onchorynchus mykiss</i> . Rainbow trout are the resident form of the species and are listed as the same species in Table 3.7.1.2.2 (p. 3-92). The offspring of each form can become the other form (i.e., steelhead can produce rainbows and vice-a-versa (Sloat and Reeves 2014)). Araki et al. (2007) found that more than 40% of steelhead adults returning to Hood River, Oregon had a least one resident	Additional text regarding the importance of habitat connectivity and intactness and the potential impacts to connectivity and intactness from revocation of ANCSA 17(d)(1) withdrawals was added to EIS Section 3.7.2.1.7, Cumulative Impacts. See also response to comment 13600-14.	Y

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			parent. Failing to recognize the relation between rainbow and steelhead trout will very likely underestimate the impacts of the proposed alternatives.		
14044-5	Joanna Cahoon	Trustees for Alaska	The DEIS incorrectly assumes that the effects of the alternatives are directly related to the area affected. The DEIS assumes that habitat quality and its capacity to support fish is static across space and across time - an assumption that has been widely discarded by aquatic ecologists for over a decade. Because an area has low productivity or abundance at one point in time does not mean that it does not have the potential to support higher abundances in the future. Longer term data on rivers in Bristol Bay showed that local abundances can vary 100-fold over decade-long time scales (the range of natural variability (Davis and Schindler 2021). Properly functioning watersheds should be viewed as portfolios, where the sustainability of the regional resource depends in part on the fact that all populations and habitats do not boom and bust at the same time (ie., low abundance in one area of the watershed are offset by high abundance in other areas - the portfolio effect) (Schindler et al. 2010, Brennan et al. 2019). A population that on average is a low contributor to the production of the portfolio can be critical in years when other, more productive populations happen to have low returns. Thus, the loss of or a decrease in productive capacity of a population in the portfolio can disproportionately affect the overall production of the portfolio (Davis and Schindler 2021).	The EIS reports the existing baseline conditions and trends (e.g., declining salmon runs on the Yukon River) and notes that additional development (e.g., mining, road construction) could result in new impacts that would affect fish populations and their habitats. EIS Section 3.7.1.2.7, Cumulative Impacts, provides additional context, including reasonably foreseeable developments, that could further impact fish and aquatic habitat. Additionally, the action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually.	N
14056-3	Theresa Kobuk, Gilbert Tocktoo, Dolly Kugzruk, Doug Katchatag, Axel Jackson	Native Village of St. Michael Tribal Council; Native Village of Brevig Mission Traditional Council; Native Village of Teller Traditional Council; Norton Bay Watershed Council; Native Village of Shaktoolik Tribal Council	Alaska is at the forefront of climate change and widespread impacts are already occurring including melting permafrost, coastal erosion, increasing air and water temperatures and the habitat displacement of fish and wildlife populations across subarctic and arctic environments. For example, in the Norton Bay Watershed, located in the KS & BSWI planning areas, the returns of all five species of Pacific Salmon were dismal for the 2023 season likely due to warming temperatures and past years fish die-offs due to high water temperatures in rivers and streams. In this rapidly changing environment with so many future unknowns, it is in the public interest to apply traditional knowledge and conventional data when assessing the impacts of climate change on the natural environment, especially when these changes are exacerbated by industrial exploitation of intact lands and pristine waters.	Declining Pacific fish stocks are described in EIS Section 3.7.2.1, Affected Environment. Climate change impacts are discussed in EIS Section 3.7.1.2.7, Cumulative Impacts. Additional text regarding the importance of intact habitats and the potential impacts from revocation of ANCSA 17(d)(1) withdrawals was added to EIS Section 3.7.2.1.7, Cumulative Impacts. See also response to comment 12994-1 regarding the use of indigenous knowledge in the EIS.	Y
14167-4	Olivia Karns	Tanana Chiefs Conference	The ANCSA (d)(1) lands include many important and high-value watersheds that feature extensive salmon spawning and rearing habitats. The sheer scale of potential for harm should these 28 million acres lose federal protection would be difficult to overstate. Virtually every intact ecozone - including all plant and animal communities across multiple watersheds in the traditional Tribal territories that rural depend on - would be at risk from potential extractive mineral development. Any level of further fragmentation of those habitats for salmon reproduction/restoration would be particularly detrimental to the wild food economies of affected communities throughout and beyond the ANCSA (d)(1) lands extent. Based on the trend and legacy over the past few decades, handing over ANCSA (d)(1) lands to the State of Alaska (Board of Fish and Board of Game management) will further contribute to the decline of the most important subsistence resource for rural communities.	Additional text regarding the importance of intact habitats and the potential impacts from revocation of ANCSA 17(d)(1) withdrawals was added to EIS Section 3.7.2.1.7, Cumulative Impacts.	Y
14257-1	Brooke Mallory	Native Village of Eyak	The draft EIS released by the Bureau of Land Management on December 15, 2023, regarding rescinding 17(d)(1) withdrawals in Alaska failed to include relevant regional research and data that is necessary to understand the impacts of rescinding withdrawals within the Copper River watershed. The draft EIS focuses on resource data that have little relevance to residents and stakeholders of the Copper River watershed (e.g., Trumpeter swans and Gulkana River Steelhead). Use patterns within these lands and the watershed that these lands are inherently a part of have been ignored. The draft EIS fails to recognize the connection of these lands to the water flowing through them, which contains headwaters, lakes, and spawning tributaries of the most productive salmon-bearing waters within the Copper River watershed. Robust data exists on Copper River salmon spawning distribution across the Copper River watershed and within individual tributaries. Much of these data were collected using Department of Interior funding, yet the draft EIS does not take any salmon data into consideration. Similar data are widely used across the globe to identify critical habitats within salmon-producing watersheds. The following information highlights the Native Village of Eyak's areas of concern, all of which are new information that the draft EIS has failed to consider. Because the draft EIS failed to evaluate the impact of rescinding these withdrawals on any Copper River salmon resources we support Option A, which would preserve the status quo. Results are briefly summarized below, and cited sources have been provided to BLM in their entirety in advance of the decision-making process; furthermore, the Native Village of Eyak offers its assistance in providing access to all data collected by the NVE's Department of the Environment and Natural Resources to help the BLM make an adequately informed decision. Copper River system-wide spawning distribution data have been collected for Chinook salmon	The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. Programmatic-level NEPA does not comprehensively catalog species in every waterbody across all lands potentially impacted by 17(d)(1) withdrawal revocations. The approach is broader, with the understanding that any future development (e.g., mining activity), even on State lands, would likely have a Federal nexus and thus be subject to a project-specific environmental review. Additional clarification was added throughout EIS Section 3.7.1, Freshwater Aquatic Habitat, to parse out known anadromous spawning and rearing habitat from ADFG (2023).	Y

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			(Savereide 2005; Schwanke and Piche 2023) and Sockeye salmon (Smith et al 2006, Wade et al. 2007, 2008, 2009). At least three major spawning drainages within the Copper River watershed contain important land withdrawals. The Klutina River watershed, the Gulkana River watershed, and the Upper Copper River watershed in particular Indian Creek and the Chistochina River. The best available data indicates these drainages are the primary locations of salmon productivity, hosting upwards of 78% of all Sockeye salmon abundance and 74% of all Chinook salmon abundance within the 62,000 km ² Copper River watershed. The importance of these land withdrawals to the long-term health and productivity of Copper River salmon and the sustainability of Copper River fisheries must be adequately assessed, but the draft EIS makes no mention of salmon on the Copper River. [See comment letter for statistical data provided by watershed.]		
14282-1	Sue Mauger, Emily Anderson, Tim Bristol, Loretta Brown	Cook Inletkeeper; Wild Salmon Center; SalmonState	The 28 million acres of D-1 lands under review support habitat important to all Pacific salmon species found in Alaska. These lands include over 5,000 miles of rivers and streams supporting migratory, spawning, and nursery habitat. As vital spawning, rearing, and migration habitats continue to see drastic changes in water temperature and stream flow, Pacific salmon species in Alaska will need to colonize new habitat. Arctic habitat may be key to the survival of Pacific salmon species as climate change continues to impact the species' current northern range. The northern reaches of BLM D-1 lands include rivers, streams, and lakes that may provide future habitat as salmon species move north to find cold water refugia due to rapidly changing water temperatures from climate change. These salmon systems provide nutrient transfers from ocean to freshwater which support abundant and diverse flora and fauna. Lifting the D-1 protections and opening these regions to mineral and oil and gas development will undoubtedly degrade water quality for these important salmon systems, fragment bird and large mammal migratory corridors, and compromise the stability of populations vital to ecosystem health. "If development (of any kind) occurs in these areas, infrastructure (e.g., roads, gravel pads, airstrips, bridges, culverts, material sites) could alter or remove aquatic habitat or physically alter flow patterns of streams they intersect.	See response to comments 13379-5 and 13890-2.	Y
14315-2	Michael Sakarias		As well, development is detrimental important salmon streams and rivers. It is well known that salmon are essential parts of the environments they pass through and die in. Salmon runs nourish entire watersheds. Alaska in on the forefront of climate change effects, with rapid change taking place as I write. While Alaska's D1 lands seem vast, they are fragile and repair themselves very slowly from natural damage. Opening the door to "development" on D-1 lands would also put much additional stress stress on fish and wildlife populations, that are already being stressed by climate change, largely due to worldwide human activity - burning fossil fuel, carbon sequestered millions of years ago. Opening D1 lands to development on top of human caused climate stresses would jeopardize the ability Alaska Native communities to rely on the resources that have sustained them for millennia.	See response to comment 13379-5.	N
14563-6	Michael Spindler		there is ZERO difference in quantified miles of water courses for all of the action alternatives, B,C,D. In Table ES-1 under fish/aquatics and water resources, for each alternative, and for each of the three levels of conveyance and/or likelihood of development, all estimates are "<1000 miles of stream" (p. ES-10, ES-14; e.g. all nine cells in each of fish/aquatics and water resources has the same <1000 miles value-- a total of 18 cells with no discernable difference). I interpret that to mean among the alternatives, only one feature was analyzed and there were no differences. I also believe that impacts might be underestimated for the higher levels of revocations in Alternative C and D	Stream miles throughout the EIS were updated to remove rounding.	Y
14563-7	Michael Spindler		Therefore, in the final EIS BLM should consider subdividing rivers/streams and analyze according to anadromous (or not), and perhaps also devise a method of quantifying relative anadromous population levels based on the fairly good history of escapement surveys in several of the more important watersheds (e.g. for my geographic area of familiarity -- High for Unalakleet, Andreafsky, Gisasa, etc., Medium for some, and Low for others).	Tables throughout EIS Section 3.7, Fish and Aquatic Species, indicate miles of streams and rivers impacted as well as miles of anadromous streams and rivers impacted. Known stock declines are also addressed in the EIS Section 3.7.2, Fish and Aquatic Invertebrate Populations. Assigning population levels to every watershed in the decision area is beyond the scope of the EIS. The variability of data across the state, and the lack of sufficient data for many regions, would result in a misleading understanding of fish stocks in waterbodies where only lower-quality or insufficient data is available.	N
14563-12	Michael Spindler		P 3-169, third paragraph. Climate change is thought to have affected chinook salmon abundance on the Yukon River (see Crozier et al. 2021, Murdoch et al. 2023). P. 3-171 First paragraph. There were also closures to all salmon harvesting on the Yukon River in some recent years.	Text in EIS Section 3.7.2.1, Affected Environment, was added to clarify declines in salmon stocks.	Y

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14582-2	Jaylene Wheeler	Bering Sea Elders Group	In the Yukon-Kuskokwim and Bering Strait regions, these lands, now managed by BLM, are subsistence use areas or critical habitat for important subsistence species, such as salmon bearing streams. Lifting D-1 protections has the potential to fragment and diminish important habitat.	See response to comment 13890-2.	Y
14627-1	–	Commercial Fishermen for Bristol Bay	Lifting the D-1 protections and opening the lands to industrial development would fragment essential wetlands and impact important salmon streams which support entire watersheds.	See response to comment 13890-2.	Y
14641-76	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The relative comparison of the alternatives is difficult to understand. What does it mean that Alternative C or D can have similar impacts as another but to a larger extent and magnitude when the alternative used for comparison, B, "...would largely avoid impacts to fish or aquatic invertebrate populations."? If Alternative B "...would largely avoid impacts to fish or aquatic invertebrate populations." then what is a greater magnitude and extent of no or little impact avoiding impacts to a greater extent? If Alternative C has the same effects as Alternative B, to largely avoid impact, but with a greater magnitude and extent wouldn't Alternative C be better than Alternative B? This is awkward wording and makes it difficult to impossible to clearly understand the potential effects of the alternatives.	See response to comment 14044-1.	Y
14641-77	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	This analysis is also inconsistent with assessment presented later in the document. As an example, it is stated (Section 3.7.2.2.4 P. 3-95) that "Alternative C, the impacts on fish and aquatic invertebrate populations would be the same as Alternative B, which is to largely avoid impacts, but to a greater magnitude and extent because more acres of fish and aquatic invertebrate populations could be affected in the focused analysis area (see Table 3.7-6). Then it is stated that "Alternative C would also have more impacts to fish and aquatic invertebrate populations than Alternative B because it would revoke 17(d)(1) withdrawals in high-value watersheds, including those used by BLM sensitive fish species." (Section 3.7.2.2.4 P. 3-95). These two sentences are not logically consistent.	See response to comment 14044-1.	Y
14641-78	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The description of the potential effects on the BLM sensitive species is confusing. The potential effects are all tied to the amount of activity that would occur in the Gulkana River. For example in Alternative C, it states that the three BLM sensitive fish species (Alaskan brook lamprey, Kigluaik Mountains Arctic char, and Gulkana River steelhead trout) would be affected "because multiple priority conveyances include suitable habitat or are immediately adjacent to the Gulkana River.". This suggest that all three Sensitive Species occur here, which is not true. This should be corrected.	See response to comment 14044-2.	Y
14641-79	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife;	Consideration of roads in the EIS is limited and not comprehensive, thus likely underrepresenting potential impacts. Roads and their associated infrastructure (e.g., culverts) can block or impede access to needed habitat (Trombulak and Frissell 2000). Road corridors can serve as important invasion routes for nonnative species, especially nonnative plants (Gonzalez-Moreno et al. 2015, Menuz and Kettnering 2013), and climate change is likely to favor continued expansion of nuisance and harmful exotic herbaceous species in watersheds (Coffin et al. 2021). Roads can increase access to previously isolated fish populations and intensify harvest. Native fish populations in previously inaccessible areas are often vulnerable to even small increases in fishing effort (Trombulak and Frissell 2000). Roads can alter access to floodplains, which are critical habitat for a number of life-history stages of many species of the potentially affected fish (Tockner and Stanford 2002; Jeffres et al. 2008). They can also exacerbate the effects of floods by impeding the ability of floodplains to dissipate to reduce the potential of high water to scour the streambed and increase the mortality of developing eggs and embryos (Goode et al. 2013; McKean and	The effects of roads on water quality and water availability are addressed in EIS Section 3.17, Water Resources. EIS Section 3.7.1.2.2, Impacts Common to all Action Alternatives, was edited to provide additional detail on the impacts from roads and mining activity.	Y

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
		Audubon Alaska; Alaska Wilderness League	Tonina 2013). Such effects are expected to increase in the future as climate changes alters hydrographs in Alaska (Sloat et al. 2017).		
14641-80	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Refer to Sergeant et al. (2022) for a comprehensive review of potential impacts of mines and mining operation. Mine impacts will also likely extend to portions of the landscape that are currently glaciated and reduce the potential for use of these areas by salmon and other native fish as the climate warms (Moore et al. 2023).	EIS Section 3.7.1.2.2, Impacts Common to all Action Alternatives, was edited to provide additional detail on the impacts from roads and mining activity (e.g., Sergeant et al. 2022). Though recent studies (e.g., Moore et al. 2023) have noted that retreating glaciers may uncover rivers and valleys that could be fish habitat, extrapolating that mining claims would occur there if 17(d)(1) withdrawals are revoked would be speculative and is not included in the EIS's cumulative effects analysis.	N
14641-81	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Specific to the Gulkana River steelhead trout, the assessment is incomplete because it fails to consider potential concurrent impacts on resident rainbow trout. Failing to recognize the relation between rainbow and steelhead trout will very likely underestimate the impacts of the proposed alternatives.	See response to comment 13600-14.	Y
14681-12	Emily Johnson	National Park Service	Lake Clark National Park and Preserve (LACL) has long-term monitoring datasets on salmon escapement as well as data on resident fish distribution and migratory behavior. The NPS has included sources for BLM to consider to strengthen the impact analysis to salmon and resident fish. Harper KC, Harris F, Miller SJ, Thalhauser JM, Ayers SD. 2012. Life history traits of adult broad whitefish and humpback whitefish. Journal of Fish and Wildlife Management 3: 5675. https://doi.org/10.3996/022011-JFWM-011 Brown, R.J., N. Bickford, and K. Severin. 2007. Otolith trace element chemistry as an indicator of anadromy in Yukon River drainage Coregonine fishes. Transactions of the American Fisheries Society 136: 678-690.	See response to comment 14257-1.	Y
14681-19	Emily Johnson	National Park Service	NPS requests that BLM consider including the concept of the "portfolio effect" (Schindler et al. 2010) when assessing environmental consequences to fish and aquatic species. According to this concept, salmon stocks like those returning to Bristol Bay perform much like a diversified financial portfolio, with all the smaller spawning populations contributing to the stability of the regional fishery over time. Last year, Bristol Bay produced an estimated 54.5 million wild sockeye salmon. However, reductions in diversity -- from piecemeal impacts to various small salmon populations -- can impact overall productivity through time.	Additional text was added to EIS Section 3.7.1.2.2, Impacts Common to all Action Alternatives.	Y
14681-20	Emily Johnson	National Park Service	Because water flows downslope and downstream, and because fish move both downstream and upstream, some environmental consequences in the DEIS seem too narrowly stated. Specifically: (a) "There would be no direct or indirect impacts on aquatic habitat for lands that remain withdrawn under Alternative X," (b) "There would be no direct or indirect impacts on fish and aquatic invertebrate populations for lands that remain withdrawn under Alternative X," (c) "There would be no direct or indirect impacts on water quality for lands that remain withdrawn under Alternative X," and (d) "There would be no direct or indirect impacts on water availability for lands that remain withdrawn under Alternative X." These statements could be inaccurate where the aquatic habitat etc. of lands that remain withdrawn are hydrologically connected to lands that are developed under Alternatives B-D. For example, consider the area 5-10 miles east of Lime Village, north of the Stony River, under Alternative C (see tab labeled "Screenshots"). NPS requests that BLM reconsider whether there are no direct or indirect impacts on aquatic habitats and water quality in withdrawn areas if fully revoked lands upslope/upstream are developed. Likewise, NPS requests	Text was revised throughout EIS Section 3.7, Fish and Aquatic Species, to clarify that withdrawals that are retained would not cause impacts to fish habitat. Also, text was added to accommodate the possibility of immediate upstream impacts to fish habitat.	Y

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			that BLM reconsider whether there no effects on salmon migrating through the Stony River, either upstream or downstream, if neighboring land is developed.		
14681-21	Emily Johnson	National Park Service	<p>The DEIS underemphasizes the connection of water and the life history of resident and anadromous fish that move up and down water bodies that are adjacent and downstream of potentially revoked lands. The NPS has included sources for BLM to consider to strengthen its current analysis.</p> <p>Water-related time series not just for SWAN but for other I&M networks and parks around Alaska and the Lower 48 can be accessed publicly at https://irma.nps.gov/aqwebportal/.</p> <p>Wet deposition data are part of a broader monitoring network and those data can be found at nadp.slh.wisc.edu/networks/national-trends-network/. The site we operate, AK97, is one of only a handful in the state. It's located in King Salmon, AK.</p> <p>Contaminants in resident fish data are spread across a couple websites, representing both short-term research and long-term monitoring data: DataStore - Mercury Concentrations in Resident Lake Fish Sampled from Lake Clark National Park and Preserve in 2019 and 2020 (nps.gov) DataStore - Mercury Concentrations in Resident Lake Fish Sampled from Katmai National Park and Preserve in 2021 (nps.gov) DataStore - Freshwater Contaminants - baseline data before protocol (nps.gov) Assessment of mercury sources in Alaskan lake food webs (ver 1.1, September 2023) - ScienceBase-Catalog</p>	<p>See response to comment 14257-1.</p> <p>Clarification was also added to the text to disclose the possibility of upstream impacts to fish populations by alternative.</p>	Y
14681-23	Emily Johnson	National Park Service	Given the limitations in the State of Alaska's Anadromous Waters Catalog, the NPS requests BLM consider the number of miles of streams affected as a more accurate measure. Another alternative would be to list the number of streams and anadromous streams.	EIS Section 3.7, Fish and Aquatic Species, presents both the total stream miles and the total anadromous stream miles.	N
14681-24	Emily Johnson	National Park Service	The Alaska Department of Fish and Game's (ADFG) Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes -- or Anadromous Water Catalog (AWC), for short -- underestimates the number of streams used by anadromous fish in the State of Alaska by virtue of how the database is generated. Individuals must nominate streams to be listed as anadromous in the catalog. Therefore, according to the AWC website, it is believed that the database currently "represents a fraction of the streams, rivers, and lakes actually used by anadromous species" (https://www.adfg.alaska.gov/sf/SARR/AWC/). The NPS requests that BLM include this in the EIS and pair it with a second estimate of anadromous habitat which accounts for that error.	A disclosure about ADFG (2023) was added to EIS Section 3.7.1, Freshwater Aquatic Habitat, to recognize the limitations of the data and that they remain the best available data.	Y
14681-25	Emily Johnson	National Park Service	For the rows pertaining to (a) freshwater aquatic habitat and (b) water quality, the summary table is misleading because it makes Alternatives B, C, and D seem equal and equally trivial in impact. The NPS requests BLM review omission of the column in subsequent tables where the difference between Alternatives is clear: "Miles or Acres where 17(d)(1) Withdrawals Would be Revoked" in Tables 3.7-3, 3.7-4, and 3.7-5. The NPS also requests BLM review the omission of the row where the difference between Alternatives is clear: "Wetlands (acres)" in the same tables. Finally, the NPS suggests that BLM change how they are quantified to be more comparable; unlike other indicators in the table, these round to the nearest 1000 suggesting that nothing <1000 miles or acres is worth quantifying.	See response to comment 14563-6.	Y
14681-28	Emily Johnson	National Park Service	In the Executive Summary Table - Fish and Aquatic section, NPS suggests changing the base unit for the number of miles of streams affected to 50 or 100. As is it is difficult to assess the impacts of the different alternatives as they are all listed as <1000 miles. Similar comment for other tables (e.g., 3.7-3, 3.7-4, 3.7-5, 3.17-2, 3.17-3, 3.17-4).	See response to comment 14563-6.	Y
14681-29	Emily Johnson	National Park Service	The NPS suggests expanding table 3.7-1 to include the values for each alternative rather than just for the overall analysis area.	EIS Table 3.7-1 summarizes the affected environment, not the alternatives. The alternatives are summarized in the tables in the environmental consequences sections.	N
14681-30	Emily Johnson	National Park Service	The NPS requests that BLM note that Trophy northern pike fisheries are also present in the Bay planning area.	See response to comment 14257-1.	N
14681-41	Emily Johnson	National Park Service	The EIS addresses aquatic ecology at such a course scale as to be irrelevant - all Alternatives less than 1000 miles of anadromous stream impacts? And water flows downstream and fish move up and down stream so minor tributaries even have the potential to impact critical spawning and rearing habitat of both resident and anadromous fish, and the potential for industrial development contaminants to affect major rivers and estuaries downstream (for example Stony River critical whitefish spawning habitat very important to subsistence an even more so with salmon declines and the Stony flow into the Kuskokwim River essential salmon, numerous species of whitefish including spawning habitat of endemic Bering cisco, smelt, burbot and many more fish species	<p>See response to comments 14257-1 and 14563-6.</p> <p>Also, clarification was added to EIS Section 3.7.1, Freshwater Aquatic Habitat, to disclose the possibility of upstream impacts to fish habitat.</p>	Y

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			essential for many subsistence communities and cultural way of life). Many important subsistence fisheries across the range of the proposed D-1 withdrawal lands are very long lived species with the potential to bioaccumulate toxins such as - sheefish, broad whitefish, burbot, pike. The EIS would benefit from a much finer scale evaluation of fish and aquatic ecology. Also most rural communities get their drinking water directly from nearby streams and rivers - contaminants flowing downstream is of great concern.		
14757-1	David Cannon		And when I did move here to Alaska in 1998 I expressed my concerns to many of my fellow biologists and at that time some of them considered me Chicken Little because I could already see many of the same impacts going on, or potentially to go on, that I'd seen down there. And I think this is a good example here. I don't have to tell anyone in this room the concerns for the Chinook salmon, the chum salmon not only in the Kuskokwim, but the Yukon and even Southeast Alaska on Chinook salmon. So my concern is that we are going to see lots of developmental concerns of all kinds and pressures.	Declining Pacific fish stocks are described in EIS Section 3.7.2.1, Affected Environment.	N
14759-2	Dan Gillikin		If I'm interpreting these maps correctly, I have a concern regarding the BLM lands situated in the Holitna Basin. Specifically it looks like under Alternative C there are there's quite a bit of acreage. I would say 80 percent of it is designated as fully revoked. So that would allow for mineral entry. A little bit of background. The Holitna Basin and that system is the largest tributary of the Kuskokwim. It provides probably close to 30 percent of all the salmon within the Kuskokwim drainage. There hasn't been a lot of development up there, some homesteading, a little bit of guided operation. There's some significant hunting activity by locals occur up there. If anything it is a jewel in the crown of the Kuskokwim River. I believe it should receive as much protection as possible.	See response to comment 13851-2.	N
14760-1	Joe Kameroff		I was just curious on your priority one and twos, has there been any substantial studies done to that may affect all our spawning areas? Because, you know, we all live on subsistence out here, so it's really important that those areas are protected. Not only for us, but for our future generations. And I know our corporations and TKC and everybody else is looking out for that, but I'd just like to echo that.	See response to comments 13851-2 and 14257-1.	Y
3021-4	Haley Hoover		Salmon runs in our region are already subject to changing ocean conditions due to climate change. protection of spawning habitats is critical to their survival. Moving forward. salmon runs all over the world have crashed, due to developmental pressure. If Alaska's to maintain its mantle of being last to hold on to wild salmon runs. We have to prioritize the health of our watersheds by keeping them intact.	See response to comment 13890-2. Declining Pacific fish stocks are described in EIS Section 3.7.2.1, Affected Environment.	Y
9998-2	Dean Barlip		Another thing too -- and my other concern is that the lands that were selected in this area are around fish and salmon bearing streams. So there's land selected on both sides of the Klutina River. Lands selected by the Copper River down towards Chitina. That map is kind of drawn out, so it's kind of hard to see exactly where that land is, so it might be close to the lower Tonsina or Kenny Lake area. But Chitina and Kenny Lake is the first village and community from the ocean on the Copper River. So any -- I'm not saying that those lands would open it up, that they would be mined on, but if they were opened up and given the option, you know -- the potential option of being mined someday -- you know, any kind of mining by the Copper River at the point of -- the first point off the ocean, you know, is not just going to affect the local people here, but it's going to affect the vast majority of Alaska where the Copper River salmon population distributes into other streams.	See response to comment 13851-2.	N
14842-3	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	We recommend additional discussions for floodplain and sheet-flow connectivity, including how floodplains are an important component of the aquatic ecosystem with many benefits enhancing fish and wildlife habitat, and wetland functions. Discussions should also include how water connectivity downgradient from roads can be adversely impacted by culverts, concentrating sheet flow that would normally spread across the wetland.	Additional text was added to the description of impacts to flow patterns and surface water in EIS Section 3.7.1.2.2, Impacts Common to All Action Alternatives, including the impacts from roads and culverts.	Y
14842-6	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	We recommend any revocation take into consideration important spawning, rearing, and overwintering habitat areas and minimize their conveyance.... Spawning and rearing sights may differ spatially and temporally. While spawning sights may be a specific location, rearing habitat may include a larger area.	See EIS Section 3.7.1.1.1, Physical Habitat, for a description of spawning, rearing, and overwintering habitat present in the decision area, and EIS Section 3.7.1.2, Environmental Consequences, for a discussion of the impacts to spawning, rearing, and overwintering habitat for fish.	N
14842-9	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	The Chilkat River watershed hosts all five species of Pacific salmon and is one of the most important rivers for healthy salmon populations in Southeast Alaska. The tributary spawning streams for salmon include Glacier Creek, Porcupine Creek, the Tsirku River, the Chilkat River, and the Ferebee River. Each of these creeks and rivers, and many others, run through D1 lands. Removing D1 withdrawals in this area has the potential to further fragment an already fragmented landscape and threaten success of some wildlife species. Declines of mountain goats have been	Additional text regarding the importance of habitat connectivity and potential impacts to it from revocation of ANCSA 17(d)(1) withdrawals was added to EIS Section 3.7.2.1.7, Cumulative Impacts. Retaining the withdrawals in the Haines Amendment region is included in Alternatives A and B. Most of these lands are retained in Alternative C. All the lands in the Haines Amendment region within the EIS analysis are already selected by the State of Alaska and could be conveyed at any time, regardless of the Secretary's decision.	Y

Fish and Aquatic Species					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			documented within the Chilkat Valley, and the king salmon fishery has been closed in the Chilkat and Chilkoot Rivers for several years due to low returns. Fragmenting these lands would also present challenges to subsistence and traditional gathering, fishing, and hunting opportunities.		
14842-12	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	Sheefish (Inconnu), the largest member of the whitefish subfamily, is a prized subsistence food and a dietary staple in much of the Northwest. Families from the Iñupiat villages of Kobuk and Shungnak move to camps along the Kobuk River each summer to fish for salmon (qulugruuq), whitefish (quasriġuk), and sheefish (sii) (Georgette and Loon 1990). The Kobuk River supports the largest population of spawning sheefish in northwestern Alaska (Scanlon 2009, Taube and Wuttig 1998) and is one of only two spawning areas for sheefish in the Northwest Arctic region, with the second spawning area in the upper Selawik River. Both sheefish populations intermingle in their wintering grounds in Hotham Inlet and Selawik Lake, where they are a key subsistence resource for the nearby communities of Kotzebue, Noorvik, Selawik, and Buckland. The importance of this species to subsistence users is illustrated in the Alaska Department of Fish and Game subsistence harvest reports.	Impacts to subsistence are analyzed in EIS Section 3.14 Subsistence. Sheefish is acknowledged as an important subsistence species. Impacts to fish habitat, including spawning habitat, is analyzed in EIS Section 3.7, Fish and Aquatic Species.	N

Terrestrial Mammals					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10008-1	Sonny Ahkivgak		I live in Fairbanks. I am a master's student at UAF. I've spent countless hours studying about the Western Arctic Caribou Herd and other caribou herds across Alaska, and the environmental impacts of continued development, specifically the anthropogenic noise impacts of or, the impacts of anthropogenic noise on the Western Arctic Caribou Herd. Unfortunately, there is a huge research gap. We do not know the specific results of continued development like roads, fossil fuel development mines. And honestly I do not want to be the one doing the research on the potential mines and development that could be happening on these grounds. As much -- as many hours I've spent researching about the Western Arctic Caribou Herd and other caribou herds of Alaska, I've also spent many hours with my community listening to people talk about the environmental impacts of continued development in our communities. And if you're unaware, the Western Arctic Caribou Herd had a high population of about 500,000 in the year 2005. This year, or last year, the population is down to 147,000. That is a huge loss, and that is something that over 40 communities are experiencing a loss of -- a lack of being able to subsistence hunt, being able to put food on their tables, and it's the continued dependence of having to go to the stores with extremely high grocery prices in the villages.	The decline of the Western Arctic herd to 152,000 animals in 2023 was added to the EIS. Effects of development on caribou are discussed in EIS Section 3.15, Terrestrial Mammals.	Y
10011-1	Jim Magdanz		What jumps out at me from the maps is the overlap of the Western Arctic Caribou range with these (d)(1) lands. And the caribou migration routes are at least partly protected by existing conservation lands -- the Noatak Preserve, the Kobuk, the Gates of the Arctic. But what has not been protected by conservation lands is the calving grounds and the winter range. And those, especially the winter range, are really congruent with these (d)(1) lands. So my thought -- my first thought is that preservation of those -- or protection of those calving grounds and the wintering grounds from development infrastructure is really important. The other thing I noticed is that there is (d)(1) lands just north of the Red Dog Mine.	A map of 17(d)(1) withdrawals in relation to seasonal distribution of the Western Arctic herd was added (Figure 3.15-2 in Appendix A, Figures). Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2). The three northernmost parcels that are revoked in part under Alternative B, although not in the focused analysis area, are in or on the edge of the Western Arctic herd calving distribution and in the middle of the area where the herd moves post-calving.	Y
10029-1	Loretta Brown	SalmonState	First, the (d)(1) withdrawals include lands that contain intact ecosystems that support key fish and wildlife habitat across vance -- vast landscapes. And these (d)(1) uplands and riparian areas feed rivers that support the five species of specific salmon, sheefish, and resident trout, and grayling. And these -- these lands also support significant habitat areas for migratory and resident birds, caribou migration corridors and calving grounds, and an abundance of moose, and Alaska's large predatory species. Retaining the (d)(1) withdrawals will retain this intact connectivity for Alaska's marine, freshwater, and terrestrial ecosystems, and provide these fish, wildlife, and flora the capacity to adapt and mi- -- and migrate as climate impacts progress in the future. And that leads into my -- the second reason that we think the (d)(1) withdrawals -- retaining of (d)(1) withdrawals is very important. Alaska is at the forefront of climate change. The lands with the (d)(1) withdrawals in place encompass expansive landscapes and intact water bodies that do not -- that not only support that abundant wildlife, but also are vital to climate (indiscernible) ecosystems.	Effects of development and climate change on connectivity and movement are discussed in EIS Sections 3.15, Terrestrial Mammals, and in EIS Section 3.7, Fish and Aquatic Species. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
10116-3	-	Alaska Wilderness League	3.15.1.1. Affected Environment Lands conveyed from federal to state management would have a large impact on rural subsistence	EIS Figure 3.15-1, Caribou herds that overlap with ANCSA 17(d)(1) withdrawals, shows the ranges of caribou herds that overlap with the 17(d)(1) withdrawals. The decline of the Western	Y

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			<p>users, as the lands would no longer be managed under Federal Subsistence Rules. One of the most consequential is that rural residents would no longer be given a preference to subsistence if the lands were conveyed to the state. Why are the maps of the ranges of the 32 caribou herds in Alaska, not applied as an overlay to the maps showing where the 17(d)(1) lands are located? This is an important piece of information that is not adequately presented, illustrated or analyzed in this DEIS. I am referring to this map: https://www.fws.gov/media/map-alaskas-32-caribou-herds The map of Alaska's 32 Caribou Herds, should be attached and incorporated into this analysis, as caribou are a critical subsistence resource throughout the state. Populations numbers are decreasing. They need large tracts of land to meet their lifecycle needs. Studies also show that caribou tend to migrate and utilize different calving and foraging areas. Multiple recent stories in the news have alarming messages regarding the health and populations of caribou in Alaska and to people that are dependent upon caribou to meet their subsistence needs and should be incorporated in the DEIS:</p> <p>A. https://www.adfg.alaska.gov - "Alaska Fish and Wildlife News". August 2023 Caribou Herd Decline Western Arctic Herd: According to the Alaska Department of Fish and Game's website, "Why is the Western Arctic Caribou Herd Shrinking? 164,000 is the lowest count since early 1980's." The Western Arctic Herd provides an important subsistence resource (see below) and their range is featured in this analysis of potential lands to be conveyed to the state. This article states "The lack of available caribou has greatly impacted the subsistence harvest of many villages in the region." A figure from the article, illustrates the decline. [figure in attachment] It also provides graphics that illustrate that caribou locations during calving, summer and winter foraging are not consistent year to year. These should all be incorporated as graphics and analysis in this DEIS, as any decision to transfer these lands to the state, could have a impact on potential subsistence harvests and future regulations.</p> <p>B. https://www.adfg.alaska.gov/static/applications/publicnotification/2023/releases/R4-AA-23-1056.pdf Nelchina Herd: The Nelchina Herd, which is located in another area of this analysis, is also experiencing decreased numbers and hunting and subsistence issues. In 2023, it was determined that the Nelchina Caribou Herd could not meet the amount necessary for Subsistence (600-1,000 caribou), and an Emergency Order was issued to close hunts in this area.</p> <p>C. https://esajournals.onlinelibrary.wiley.com/doi/10.1002/eap.2923 "Effects of vehicle traffic on space use and road crossings of caribou in the Arctic" by Severson, John P, Timothy C. Vosburgh, Heather E. Johnson October 3, 2023. In Ecological Applications. This study should be incorporated in the DEIS analysis.</p> <p>D. https://www.adn.com/alaska-news/wildlife/2024/02/01/state-adopts-reduced-subsistencehunting-limit-for-western-arctic-caribou-of-15-animals-a-year/ "State adopts reduced subsistence hunting limit for Western Arctic caribou of 15 animals a year."</p> <p>E. https://www.adn.com/arctic-southern/news/2024/01/25/oil-field-road-traffic-disrupts-northslope-caribou-more-than-previously-recognized/ "Oil field road traffic disrupts North Slope caribou more than previously recognized."</p>	Arctic herd is described in EIS Section 3.15, Terrestrial Mammals, and was updated to include the most recent population estimate of 152,000 animals. Discussion of Severson et al. (2023) was also added. Effects to subsistence are described in EIS Section 3.14, Subsistence.	
126-1	Eric Warner		I know you are also aware that industrial operations in these lands could permanently imperil healthy populations of not only caribou, but their predators.	Potential impacts of development on caribou and predators are discussed in EIS Section 3.15, Terrestrial Mammals.	N
12889-3	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	The DEIS acknowledges that the potential for development is likely to increase if D1 Withdrawals are revoked (p.3-172), and that the impacts from this are expected to increase in Alternatives that make more acreage of D1 Withdrawals available (p.3-182). This is especially concerning for the Kobuk-Seward Peninsula Planning Area, which overlaps much of the WACH range. This region has the greatest potential for future mining projects (Appendix C, p.63), giving it the greatest potential for cumulative impacts from mining accentuated by D1 Withdrawal revocations on subsistence users. The DEIS' recognition that infrastructure "could cause substantial changes in range distribution" for caribou and that the combination of increased development and revocation of D1 Withdrawals "would contribute to changes in caribou migration, distribution, and abundance, with resulting impacts on subsistence resource availability to communities that use these resources" (Appendix C, p.64) is of grave concern for the Working Group and reinforces the importance of maintaining D1 Withdrawals.	The potential impacts of development as a result of revocation on the Western Arctic herd are discussed in EIS Section 3.15, Terrestrial Mammals and the impacts of potential changes in caribou abundance, access, or availability on subsistence are discussed in EIS Section 3.14 Subsistence. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
12889-4	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	For example, the DEIS describes millions of acres of the WACH annual range that would be opened up under revocation, including tens of thousands of acres overlapping priority conveyances and lands likely to be developed (e.g., Table 2.7-4, p. 2-16; Table 3.15-4, p.3-248). These are sobering statistics but still do not capture the full magnitude of the importance of those lands. The DEIS quantifies impact for caribou as the acres of annual range in the focused analysis area (p.3-240). However, this treats all acres as equal, ignoring seasonal differences in critical habitat. The D1 Withdrawals overlap areas of calving habitat, insect relief, summer range, winter range, and migratory areas for the WACH. As the DEIS acknowledges (e.g., p.3-187), the calving grounds are	A map of seasonal ranges of the Western Arctic herd was added (Figure 3.15-2 in Appendix A, Figures). While some 17(d)(1) withdrawals are near the calving grounds of the Western Arctic herd, they are not priority conveyances that are likely to be developed.	Y

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			crucial for caribou and the calving period is a time of heightened sensitivity to disturbance. However, this is not connected in the DEIS to overlap of D1 Withdrawals to calving grounds and other key seasonal ranges, nor are such seasonal ranges mapped in the DEIS. We are very concerned about any revocation of D1 Withdrawals on the calving grounds. Similarly, insect relief and winter habitat are important for caribou, allowing them to escape detrimental effects and access important forage resources at key times throughout the year.		
12889-6	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	The DEIS cites the WACH population size at 164,000 caribou (p.3-241). This likely was the most recent count when the document was written but the 2023 photocensus conducted by the Alaska Department of Fish & Game indicated continued decline, with the new 2023 count at 152,000 caribou. This number should be updated in the FEIS to reflect the ongoing decline in the herd, which has implications for the effects of proposed D1 Withdrawal revocation.	The population size of the Western Arctic herd was updated to the 2023 estimate of 152,000 in EIS Section 3.15, Terrestrial Mammals.	Y
12889-7	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	The DEIS states that although Alternative C would make more of the southern portion of the WACH winter range available this area has not been heavily used in recent years (p.3-246). While it is good to be aware of recent patterns of caribou distribution and habitat use, effective management over the timescales relevant to a decision such as revoking D1 Withdrawals necessitates consideration of historic patterns of caribou habitat use. Research has shown that as herd size changes caribou may expand or contract their range use accordingly (e.g., Taillon et al. 2012, Virgl et al. 2017). While recent declines in the WACH may lead to a smaller overall area of habitat use, it is incumbent on BLM to make decisions that will be robust in future periods of both herd decline and growth. The potential impacts of revoking D1 Withdrawals and of development will be of long duration, lasting decades (e.g., p.3-12). It is crucial that the decisions made be designed to afford population protection at both high and low population levels. The best way to accomplish this is by retaining all D1 Withdrawals.	EIS Section 3.15, Terrestrial Mammals, was modified to make clear winter ranges vary, and lack of recent use does not mean an area is unimportant.	Y
12889-8	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	For many years, the WACH was the largest caribou herd in Alaska, with nearly 500,000 animals at its peak in the early 2000s. This large, wide-ranging herd provides a crucial subsistence resource to residents of approximately forty remote communities spread across the range of the WACH, as well as many others who rely on caribou for their livelihoods or other reasons. The herd also plays an important role in a healthy environment that supports many other species and natural processes. Unfortunately, for about two decades the herd has been in serious decline, as the DEIS acknowledges (e.g., p.3-171). The 2023 count of 152,000 represents the lowest numbers since the 1970s. In light of this, for the last three years the Working Group recommended that the WACH be managed at a "preservative, declining" level. This includes limiting harvest of the herd, preventing loss or degradation of seasonal habitat, and mitigating human impacts. We appreciate recognition of this management recommendation in the DEIS (p.3-244) and urge BLM to heed it in making their final decision on maintaining D1 Withdrawals.	The decline in the Western Arctic herd and potential impacts of development on the herd and subsistence harvest are discussed in EIS Section 3.14, Subsistence, and EIS Section 3.15, Terrestrial Mammals. The population size of the Western Arctic herd was updated to 152,000. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
12889-9	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	With the WACH already in decline, it is extra important to take proactive measures to protect habitat and reduce potential impacts to caribou. Greater attention should be given in the FEIS to overlap of D1 Withdrawals with caribou seasonal ranges and these should be clearly depicted in maps.	A map showing Western Arctic herd seasonal ranges and 17(d)(1) withdrawals was added.	Y
13347-1	Anna Crosby		Why has there not been more analysis on how opening 189,000 acres of Nelchina caribou herd range to potential development could impact caribou population size, habitat connectivity, and especially subsistence hunting?	The recent decline in the size of the Nelchina herd as well as potential impacts of development on the herd are discussed in EIS Section 3.15.1, Caribou, and EIS Section 3.14, Subsistence. Per 40 CFR 1502.2, an EIS shall not be encyclopedic, and the information provided is sufficient for a Secretary to make a reasoned choice among alternatives.	N
13379-3	Alex Whiting	Native Village of Kotzebue	Currently, the Western Arctic Caribou Herd (WACH), which uses the (d)(1) lands at issue in the Kobuk-Seward Peninsula planning area for feeding, wintering, and migrating between summer and wintering grounds, is in a multi-year decline. Any kind of land altering activities that may occur in these areas due to changes in land ownership, would contribute to making it harder for the herd to reverse the decline. Industrial activities and habitat fragmentation are major risks for caribou herds in general, and pose heightened risks to herds that are in population decline. In addition, the moose population across much of the (d)(1) Kobuk-Seward Peninsula planning area is a low point, or has seen a significant decrease in population in recent years.	The decline in the Western Arctic herd is discussed in EIS Section 3.15.1, Caribou, and this section was updated with the most recent population estimate of 152,000 caribou in 2023. A map of Western Arctic herd seasonal distribution was added to the EIS (Figure 3.15-2 in Appendix A, Figures). Effects to moose from development are discussed in EIS Section 3.15.2, Moose. Recent moose density estimates were added to the EIS (Table 3.15-6, Estimated Moose Density or Trend by Game Management Units in the Analysis Area with Recent Moose Density or Trend Data Available).	Y
13467-2	Marisa Reynolds		These BLM lands are home to three of North America's largest caribou herds. The largest of these, the Western Arctic Caribou Herd, undertakes one of the longest terrestrial mammal migrations in the world. Communities rely on caribou migratory movements for subsistence harvest--a critical resource in northwest Alaska	The potential impacts on the Western Arctic herd are discussed in EIS Section 3.15.1, Caribou, and EIS Section 3.14, Subsistence. A map of seasonal distribution of the Western Arctic herd was added to the EIS.	Y
13486-4	John Strassenburgh		The Susitna watershed supports brown and black bear, moose, the Nelchina Caribou herd, fox, wolverine, and much more.	EIS Section 3.15, Terrestrial Mammals, discusses the terrestrial mammal species present in the decision area, including brown and black bears, moose, caribou, fox, and wolverine.	N

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13600-7	Jen Leahy	Theodore Roosevelt Conservation Partnership	Caribou are an important species for subsistence, cultural, and recreational uses, and many caribou herds in Alaska are currently in decline. Revoking the D-1 withdrawals could have profound impacts on caribou because of increased habitat fragmentation and industrial activity. There is an opportunity to incorporate more of the best available science regarding potential caribou behavioral disturbances in the final EIS. We support the inclusion of the studies cited by the Alaska Chapter of The Wildlife Society in their comments. We also recommend the inclusion of a study by Parlee et al. (2018) which describes the "tragedy of open access" and the impacts of mineral resource development on Canada's Bathurst herd, which has experienced one of the steepest declines of any large migratory barren-ground caribou herd.	Parlee et al. 2018 was added to the EIS. Potential impacts to caribou are described in EIS Section 3.15, Terrestrial Mammals.	Y
13600-8	Jen Leahy	Theodore Roosevelt Conservation Partnership	The final EIS would benefit from a more nuanced understanding of habitat variability and the amount of space that caribou require, given their low fidelity to seasonal ranges. Long-time Western Arctic Caribou Herd biologist Jim Dau describes naturally intact home range as the most important factor for the long-term survival of caribou. Caribou need access to multiple geographically disparate areas to have options for distributing themselves to best utilize available food, areas of low insect and predator abundance, and areas of low hunting pressure. Although caribou herds rarely utilize their entire range in any single year, they will use 100% of their seasonal ranges over a course of decades. The biological research included in the final EIS should accurately capture these considerations.	Text and figures on variability in caribou seasonal ranges was added to EIS Section 3.15.1, Caribou.	Y
13600-9	Jen Leahy	Theodore Roosevelt Conservation Partnership	Table 3.15-1 lists the caribou herds using D-1 lands in the decision area. Several studies confirm that the migratory area and winter range used by the Teshekpuk Caribou Herd overlap with the decision area, including Wilson et al. (2016) and Fullman et al. (2021). The final EIS should analyze the potential impacts of revoking the D-1 withdrawals to the Teshekpuk herd.	The text has been updated to make clear that some Teshekpuk herd animals are occasionally in the decision area, however, it is an area that is used infrequently with no collared animals present in most years.	Y
13600-10	Jen Leahy	Theodore Roosevelt Conservation Partnership	Moose are also a valuable resource, especially for subsistence communities with diminished access to caribou. The BLM has previously mapped important moose habitat in three of the RMPs in the decision area. Including this analysis in the final EIS would help identify and mitigate potential impacts to priority moose habitat in areas where development is most likely to occur if the withdrawals are revoked.	Moose habitat is not mapped for the entire decision area. The EIS provides moose densities by game management units, when available. Moose are widely distributed across most of Alaska where suitable habitat occurs but some large differences in density occur at the game management unit scale. Moose tend to occur in higher densities in areas with early successional browse species such as riverine areas or areas that had burned approximately 10 to 30 years ago. The EIS assumes moose presence throughout the decision area.	N
13600-11	Jen Leahy	Theodore Roosevelt Conservation Partnership	The draft EIS mentions Dall sheep only briefly and does not specifically analyze the impacts of revoking the D-1 withdrawals to this iconic species. Dall sheep habitat is located throughout the decision area, and given the sensitivity of this species to disturbances and the concerning population declines of Dall sheep across Alaska, the TRCP strongly recommends that the final EIS include a thorough review of the potential impacts of revoking the withdrawals to Dall sheep.	Text on Dall sheep and potential impacts was added to the EIS Section 3.15.4, Other Terrestrial Mammals.	Y
13600-20	Jen Leahy	Theodore Roosevelt Conservation Partnership	Despite being an important tenant of wildlife ecology and a bipartisan policy priority, habitat connectivity is only mentioned twice in Volume 1 of the draft EIS. Habitat connectivity allows wildlife to move unimpeded over various habitats with the changing seasons, supporting population health, genetic flow, and resilience to climate change. Landscape connectivity is arguably one of the most important functions of the D-1 withdrawals, which in some cases serve as a buffer between conservation system units and other public lands. In other words, the existing habitat benefits of the D-1 withdrawals often extend beyond their borders. As northern species confront a rapidly changing climate in Alaska--and in some cases, diminishing habitat suitability--wildlife must be able to move freely to access variable habitat types. Habitat fragmentation, a common result of industrial development, may prevent wildlife from accessing the full extent of their historic ranges, making it more difficult for keystone species such as caribou to adapt to climate change. If the D-1 withdrawals are revoked, habitat fragmentation is most likely to occur on lands that the BLM has identified as more likely to be developed. * In the final EIS, the TRCP asks the BLM to analyze habitat connectivity, identify potential wildlife corridors, and provide management alternatives for conserving and restoring important wildlife corridors. We also urge the BLM to include specific connectivity corridors in the EIS that have already been identified through the Bering Sea-Western Interior RMP.	Maps of the fall and spring migration distribution of the Western Arctic herd and the Nelchina herd were added to EIS Section 3.15.1, Caribou. Additional text on the importance of habitat connectivity was added to EIS Section 3.15.4.2.2., Impacts Common to All Action Alternatives.	Y
13628-2	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The connectivity of landscapes is key to establishing the overall persistence, strength, and integrity of the remaining ecological interactions (Stephenson and Calcarone 1999) and must be considered in the DEIS. Despite being such an important consideration for wildlife, terrestrial mammal habitat connectivity is scarcely mentioned in the DEIS. The BLM needs to coordinate research, management, and planning with adjacent lands to ensure that the goals of habitat connectivity and resilience are achieved. D1 Withdrawals are an important component of a greater, fully intact ecosystem as a conservation system, and BLM must consider the role of these lands beyond their borders. We encourage BLM to include meaningful discussion and effort in identifying, managing, and protecting wildlife corridors. The FEIS should include an analysis of habitat connectivity,	See response to comment 13628-3. Maps of fall and spring migration distribution were added for the Western Arctic and Nelchina caribou herds (see Figures 3.15-2 and 3.15-3 in EIS Appendix A).	Y

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			<p>identification of potential wildlife corridors, and management alternatives for protecting and/or restoring important corridors. BLM has tools at its disposal that can be applied to designate and protect wildlife corridors, as has been demonstrated in two existing Resource Management Plans (Bering Sea-Western Interior RMP and Central Yukon draft RMP). To appropriately designate and protect wildlife corridors the BLM should:</p> <p>Collaborate with other state and Federal agencies and non-governmental groups to obtain current data regarding crucial wildlife habitat and corridors;</p> <p>Connect already-designated conservation areas and other protected lands to ensure that wildlife populations have the ability to easily move between large areas of protected crucial habitat;</p> <p>Identify focal species for identifying important wildlife corridors that will also act as indicators for how well the wildlife corridors are working; and</p> <p>Incorporate data on core habitat, linkages, and buffer areas into the FEIS, in addition to wildlife corridors, to best guide other management decisions and future research.</p>		
13628-3	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	<p>The Bering Sea-Western Interior (BSWI) RMP identified connectivity corridors using an analysis of landform features to design a climate resilient connection between the Yukon Delta National Wildlife Refuge and the Innoko National Wildlife Refuge (BLM 2021). The analysis takes a geodiversity approach by using topography, soil, and hydrologic features because those characteristics are less dynamic and more enduring than species composition or land cover. This approach assumes that similar ecosystem types and functions will occur in similar topographic conditions and that similar topographic niches (e.g., steep, high elevation, sunny slopes) can host similar ecological assemblages. With this approach, BLM identified two major connectivity corridors (North Connectivity Corridor and South Connectivity Corridor) with restricted leasing and development to facilitate adaptive management by retaining connectivity between USFWS refuges in the planning area (see BLM 2021 Map A-10). During pre-planning for both the BSWI and Central Yukon RMPs BLM participated in and supported studies that identified wildlife connectivity corridors and ecological benchmarks that considered focal species and the locations of adjacent conservation units such as refuges and parks (Lisgo et al. 2018, Magness et al. 2018). BLM should incorporate results of these studies by identifying and recommending specific connectivity corridors in the FEIS. Blocks of D1 Withdrawals within connectivity corridors should be retained.</p>	Information regarding wildlife habitat connectivity corridors was added to EIS Section 3.15.4.1, Other Terrestrial Mammals, Affected Environment, and Section 3.15.4.2.2, Impacts Common to All Action Alternatives.	Y
13628-4	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	<p>The Bay Planning Area DNR management plan incorporates the importance of viewing landscapes at a broad-scale, complex level:</p> <p>When issuing permits and leases or otherwise authorizing the use or development of state lands, DNR will recognize the requirements of the activity or development and the effects to habitat when determining stipulations or measures needed to protect fish, wildlife, or their habitats. The costs of mitigation relative to the benefits to be gained will be considered in the implementation of this policy. The underlying integrity of the ecological system and traditional way of life in this region is to be maintained to the maximum extent practicable. (DNR 2013 p.2-9)</p> <p>The FEIS would be strengthened by incorporating such a perspective with respect to habitat connectivity.</p>	See response to comment 13628-3.	Y
13628-5	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	<p>The Alaska DNR draft Copper River Basin Area Plan highlights the protection and management of valuable environmental areas, essentially describing connectivity corridors: The state will provide, in its design of land disposals, an open-space system to preserve important fish and wildlife habitats and natural areas such as shorelands, freshwater wetlands, and riparian lands. As part of this design process, consideration should also be given to the connectivity of habitat types as well as access to fish and wildlife resources. Where appropriate other design and management approaches may be used; these may complement an open space system or substitute for it, although preference should be given to the provision of an open space system. These areas should be designed to provide the necessary linkage and continuity to protect or increase values for human uses and wildlife movements. In some places, large areas may be protected to provide adequate terrestrial habitat (DNR 2023 p.2-52).</p>	See response to comment 13628-3.	Y
13628-6	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	<p>The Ring of Fire RMP describes recommendations for Kodiak connectivity. Kodiak NWR land use and acquisition are listed in the Kodiak Archipelago Bear Conservation and Management Plan and include continuing to acquire small parcels of high-priority bear and salmon habitat, recognizing subsistence activities, retaining salmon rehabilitation plans, and striving to ensure free movement of bears through their natural ranges (BLM 2006 p.3-144, emphasis added).</p>	See response to comment 13628-3.	Y
13628-7	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	<p>There are several places in the description of impacts of D1 Withdrawal revocation on caribou where greater support is needed from the scientific literature. For example, the DEIS indicates that seismic surveys displace caribou during winter, causing increased energy expenditures (p.3-243), but no citations are given in support of this statement. Studies from Canada reveal that</p>	Additional citations were added to EIS Section 3.15.1, Caribou.	Y

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			disturbances from petroleum exploration can lead to flight responses in caribou (Bradshaw et al. 1997, Bradshaw et al. 1998) and that caribou may avoid human infrastructure and disturbance in the winter (Dyer et al. 2002, Johnson and Russell 2014, Plante et al. 2018). Recent work has also noted behavioral changes of caribou in proximity to temporary industrial ice roads (Smith and Johnson 2023, Smith et al. 2023). These studies should be cited in the FEIS, along with additional discussion of the potential consequences of extra expenditure of energy by caribou. For example, reproductive success in caribou is strongly correlated with nutritional stress (Cameron et al. 2005) and late winter body mass of female caribou has been strongly linked to calf production and survival (Cameron et al. 2005, Albon et al. 2017, Veiberg et al. 2017), making extra energy expenditure very important as a potential influence on population growth rate.		
13628-8	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	Similarly, no citation is given for the claim in the DEIS that effects from oil and gas development would only be localized (p.3-243). Such a statement ignores observations of broader shifts in calving distribution of the Central Arctic Herd that took place after oil and gas infrastructure was constructed, with calving grounds shifting south away from areas of concentrated development (Wolfe. 2000; Cameron et al. 2002; Joly et al. 2006). While this shift is mentioned a few sentences later, these patterns need to be more clearly acknowledged and cited in the FEIS to present a more accurate picture of the potential effects of development on D1 Withdrawals currently unavailable for leasing. It is also important that the FEIS clarifies that impacts on a migratory species in one part of its annual range may have implications for the animal across its range. This is acknowledged elsewhere in the DEIS (e.g., Appendix C, p.22,25) which stands in contrast to an expectation of only local effects. The claim that effects will only be localized must be removed or be supported clearly from the scientific literature in the FEIS.	The text was edited in EIS Section 3.15.1, Caribou, to include explanation that if development causes a decline in herd size, the impacts would be regional.	Y
13628-9	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The DEIS lists a number of potentially adverse impacts of mine development on caribou but only cites two studies (Eftestl et al. 2019; Boulanger et al. 2021). There are a wide variety of studies that have considered mining impacts on caribou not cited here, including dust effects from access roads, that should be cited in the FEIS (e.g., Hasselbach et al. 2005; Boulanger et al. 2012; Wilson et al. 2016; Plante et al. 2018; Neitlich et al. 2022). Another claim made without citation in the DEIS is that potential for restricted movements would depend on the traffic volume and type of human activity associated with the road (p.3- 243). Similarly, Appendix C states that impacts from roads are particularly high during times of high ground traffic, again without citation (App. C, p.25). These statements need to be supported with the scientific literature if they are to be retained as recent studies have found altered caribou behavior even at low traffic volumes (e.g., Severson et al. 2023; Smith and Johnson 2023).	Additional citations were added to EIS Section 3.15.1, Caribou.	Y
13628-10	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The discussion of cumulative impacts for caribou contains a brief mention that "changes in predators associated with development (including project-related development) or climate change could also influence caribou populations" (p.3-250). This is insufficient consideration of the potential role that changing predator dynamics as a result of development could have on caribou, which again is stated without support from the scientific literature. There is an extensive body of scientific work describing the facilitative effects of linear features on predators. Linear corridors such as roads and seismic lines can alter the distribution of wolves (<i>Canis lupus</i>) and caribou (James and Stuart-Smith 2000). Linear features act like highways for wolves, allowing them to travel faster and farther, as well as altering their habitat selection patterns, increasing their contact with and predation of caribou (e.g., Dickie et al. 2017, DeMars and Boutin 2018). Other relevant papers that should be considered/discussed in the FEIS include Latham et al. (2011), Whittington et al. (2011), McKenzie et al. (2012), Hervieux et al. 2013, Serrouya et al. (2017) and Dabros et al. (2018). Wolf predation, facilitated by linear corridors, is thought to be one factor driving recent declines in woodland caribou in Canada (McLoughlin et al. 2003; Hervieux et al. 2013; Hebblewhite 2017). With many caribou herds in Alaska currently in decline, the potential for similar effects of increased predation as a result of D1 Withdrawal revocation, subsequent development, and other reasonably foreseeable development, is important to discuss more fully in the FEIS.	Additional text on the impact of linear features was added to EIS Section 3.15.1, Caribou.	Y
13628-11	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The DEIS states that the analysis area for caribou comprises the annual herd ranges of all herds using D1 lands in the decision area (p.3-240). However, review of Table 3.15-1 indicates that the Teshekpuk Caribou Herd (TCH) is not listed among the herds considered in the analysis. This does not align with overlap of TCH migratory use of areas around the Red Dog mining road reported in Wilson et al. (2016) or depictions of TCH winter use in Fullman et al. (2021). The BLMs North Slope Rapid Ecoregional Assessment provided GIS data indicating seasonal ranges of the four North Slope caribou herds. While BLM no longer appears to host these data online, they are still available through the University of Alaska Anchorage's Alaska Center for Conservation Science, which led conducting of the North Slope Rapid Ecoregional Assessment (ACCS 2019). Overlay of the winter range polygons from this dataset with the D1 Withdrawal polygons provided with the DEIS also shows overlap. In light of this, the TCH should also be included in the	Text was added to state that Teshekpuk herd animals are occasionally in the decision area, but use is rare and collared caribou are not present in the area in most years. Some use may occur as a result of Teshekpuk animals joining the Western Arctic herd. Welch et al. (2023) has recent maps of Teshekpuk herd seasonal distribution.	Y

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			descriptions of potential impacts of revoking D1 Withdrawals and any potential impacts should be considered in the FEIS.		
13628-12	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	Mapping for caribou in the DEIS consists of a single coarse-scale map of caribou annual ranges (Figure 3.15-1), which is insufficient for adequate evaluation of the effects of the various alternatives on caribou. For example, the DEIS states that of particular concern to caribou is the potential for development of parcels between the Kokolik and Kukpowruk rivers that could impact Western Arctic herd caribou during their post-calving movements from the calving area to insect relief areas in the Brooks Range under Alternative D (p.3-247). Discussion of the importance of this area for caribou and the implications of potential development in this region are described (e.g., p.3-244) but not mapped in the DEIS. Maps should be included that show these rivers and other key movement corridors and insect relief areas along with the D1 lands that could be made available under each Alternative. This would present a better picture of the potential impacts under the various alternatives. Similarly, where seasonal range information is available, as is the case for the larger caribou herds in Alaska, it should be depicted on maps that overlay seasonal ranges with D1 Withdrawals and their status under each alternative. This should be done at a meaningful scale that will enable evaluation of the implications of each alternative.	A map of the seasonal range of the Western Arctic herd was added to the EIS as Figure 3.15-2 in EIS Appendix A.	Y
13628-13	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The DEIS describes the potential expansion of the Red Dog Mine as consisting of 13 miles of roads and 16 acres of ground disturbance (p.3-16). For this project and other reasonably foreseeable development, it is important that the FEIS acknowledges that the actual spatial extent of impact on caribou and other species will extend far beyond this physical footprint of development. For example, Plante et al. (2018) reported displacement zones around roads (0-15 km), mining exploration (2-21 km), mines (21-23 km), and human settlements (2-18 km) and Boulanger et al. (2012) reported avoidance around mines (11-14 km). While there is likely to be year to year variation in the degree of disturbance due to development caused by changes in environmental conditions and other factors (Boulanger et al. 2021), the FEIS can nonetheless anticipate much larger footprints of impact than simply the sizes listed in Table 3.1-6. Additional citation and discussion of such factors is warranted.	Additional citations on displacement zones for caribou around development were added to EIS Section 3.15.1, Caribou.	Y
13628-14	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	Dall's sheep habitat is located throughout D1 Withdrawals and impacts to Dall's sheep could be substantial under some alternatives absent provision of additional protective mitigation measures. According to Phillips et al. (2010), "Dall's sheep in Denali responded negatively to increased traffic volumes by increasing their movement rates when approaching the road and shifting away from the road at higher traffic levels. While many studies have investigated the potential for vehicles to affect sheep behavior and distribution, most have examined individual or group responses to the approach of individual vehicles, or general distribution of sheep relative to road corridors, rather than volume or patterns of traffic... Our results reflected a threshold distance for response to disturbance by showing that sheep within 300 meters (984 ft) of the road shifted farther away at higher traffic volumes and that small increases in the number of vehicles on the road could have impacts on Dall's sheep movements. Movement of sheep away from the road corridor at higher traffic volumes may decrease the amount of habitat available for foraging. This may be most relevant to sheep during the spring season, when they most frequently cross the road and green-up has not yet occurred at higher elevations" (p.61,64). The DEIS does not comment on effects to Dall's sheep, which could be significant under development regimes. Dall's sheep are only mentioned in passing in three sentences throughout the DEIS (p.3-267, 3-268). These statements do not highlight the gravity of potential effects to Dall's sheep. The DEIS does not detail the importance of Dall's sheep in the ecosystem, neither biologically nor as relates to subsistence/hunting dependence. BLMs subsistence impact analysis under Section 810 of ANILCA should address local community use of Dall's sheep.	Additional text on Dall sheep was added to EIS Section 3.15.4, Other Terrestrial Mammals; EIS Section 3.14, Subsistence; and EIS Appendix C, ANILCA 810 Evaluation.	Y
13628-15	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	BLM mapped important moose habitat in the D1 Withdrawals and identified priority areas for moose in several RMPs (Bay, Bering Sea - Western Interior, and East Alaska RMPs). Including these maps, as well as those for the other RMP areas, in the FEIS would strengthen the ability to evaluate potential impacts of D1 Withdrawal revocation on moose and their habitat. In addition, the Reasonably Foreseeable Development Scenario (RFDS) in Appendix D should include overlay maps of moose habitat (including moose calving, wintering grounds, and rutting habitat) with lands most likely to be developed. Doing so would help clarify impacts to moose habitat under the RFDS that are currently vague in the DEIS. It is important to be able to identify where habitat ranges fall in relation to RFDS areas to determine where conflicts could arise. Additionally, Public Land Orders (PLOs) should be visibly marked on the maps to enable the reader to identify areas of priority conservation for moose habitat on D1 Withdrawals.	See response to comment 13600-10.	N

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13628-16	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	In November 2023, the U.S. Fish and Wildlife Service designated wolverines in the Contiguous United States as a threatened species, due primarily to the ongoing and increasing impacts of climate change and associated habitat degradation and fragmentation (USFWS 2023). Alaskan wolverines are increasingly facing the same challenges. Wolverine are a snow-dependent species that require large expanses of connected habitat. Maternal wolverine dens are located in areas that retain snow through the spring, and there is no evidence, either currently or historically, that wolverine populations can persist in areas without a sustained spring snowpack (Magoun and Copeland 1998). While the scientific record is sparse on the projected changes to Alaskan wolverine habitat, warming temperatures are expected to shrink the mountain snowpack wolverines rely on for hunting and denning in the Contiguous U.S. Indeed, one study stated, By the late 21st century, dispersal modeling indicates that habitat isolation at or above levels associated with genetic isolation of wolverine populations becomes widespread. Overall, we expect wolverine habitat to persist throughout the species range at least for the first half of the 21st century, but populations will likely become smaller and more isolated (McKelvey et al. 2011, p.2882). In light of the climate challenges that face this snow-dependent species, habitat connectivity is more critical now than ever. As islands of habitable alpine and tundra communities begin to melt, wolverines will require passage to pockets of higher elevation snowy areas to find adequate denning habitat with a sustained spring snowpack. The DEIS does not elaborate on these potential effects to wolverines. The DEIS does briefly state the subsistence importance of wolverines, but reduces the cumulative impacts of the proposed D1 Withdrawal revocation to two sentences: In general, large carnivores (brown bear, wolf, and wolverine) are likely to be among the species most negatively impacted by cumulative impacts because of their need for large ranges and susceptibility to human disturbance and harvest.	Wolverines and the importance of snow for maternal denning is discussed in EIS Section 3.15, Terrestrial Mammals, and additional text on wolverines was also added. The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually.	Y
13628-17	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	Congress has incentivized the conservation of non-game species at the state level by providing funding for the planning and implementation of State Wildlife Action Plans (SWAPs). Alaska's SWAP has identified species of greatest conservation need (SGCN), which include species whose population is small, declining, or under significant threat (at-risk species); species that are culturally, ecologically, or economically important; species that function as sentinel species (indicators of environmental change); and stewardship species (species with a very high percentage of their global populations concentrated in Alaska) (ADFG 2015). Of the 326 vertebrate taxa that were identified as SGCN, 71 mammals species were identified (ADFG 2015). Table 3.15-15 of the DEIS identified 51 species of terrestrial mammals that could be impacted by the project. However, this table does not include 18 species (primarily subspecies) that are identified in ADFG (2015) as SGCN that could reside within the bounds of D1 Withdrawals. The DEIS states that the 51 listed species have different distributions, preferred habitats, and life history; therefore, these species will vary in how they are impacted by land status changes within the analysis area (p.3-266) but sheds no further light on how these species will be affected by the proposed alternatives. It also does not identify which species qualify as SGCN under State guidelines. BLM should consider the habitat value provided by D1 Withdrawals and potential impacts to those SGCN species in making its decision. The DEIS glosses over non- game species entirely, and after Table 3.15-15 provides a single paragraph describing climate effects on only the trapped and hunted species from that list, proposing that subsistence users will likely be affected. The FEIS might also highlight that three of these non-game species Arctic fox, collared pika, and Alaska marmot exclusively reside in Alaska or the circumpolar region and so are found in no other U.S. state. Non-game species play critical roles in ecosystem health that are vital to maintaining healthy and productive ecosystems and should be given adequate consideration in the FEIS.	EIS Table 3.15-15, Terrestrial Mammal Species Known to or Suspected to Occur in the Analysis Area, was checked against the SGCN, and bats that may occur in Southeast Alaska were mentioned in the text below the table. EIS Table 3.15-15 was modified to identify SGCN species. The SGCN lists numerous subspecies whereas EIS Table 3.15-15 lists species; this difference accounts for the differences in numbers. Collared pika also occurs in the lower 48 states.	Y
13628-18	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	There are four species of SGCN bats that that occur (or are suspected to occur) in the analysis area: <i>Myotis lucifugus</i> (little brown bat), <i>M. volans</i> , (long-legged myotis), <i>M. californicus</i> (California myotis) and <i>Lasionycteris noctivagans</i> (silver-haired bat). The little brown bat is the only bat found in Interior and Southcentral Alaska, while the other three bat species are found in the southeast, although not in numbers that compare to the little brown bat. Habitat for Southeast Alaska bats is unlikely to be impacted, with the exception of the small patches of D1 Withdrawals. Nonetheless, potential effects to those species should be noted in the FEIS. In 2021, the little brown bat was reclassified as an endangered species by the IUCN (Solari 2021). This was an extraordinary shift from 2008 when it was designated as a species of least concern (Arroyo-Cabrales and Ivarez-Castaeda 2008). Little brown bats across the Contiguous U.S. and parts of Canada are facing sharp declines due to white nose syndrome (WNS). This infectious disease of bats threatens the survival of populations of cavern-hibernating species in North America. Since the first reports of WNS in the U.S. were discovered around 2007, the fungus <i>Pseudogymnoascus destructans</i> (the causative agent of WNS) has spread rapidly across North America at a rate of around 500 km per year. Its associated mortality rate of affected bat colonies exceeds 90% (Hoyt et al. 2015). Once common and ubiquitous bat species, like the little brown bat, face predictions of local extirpations	Additional text on bats and white nose syndrome in Alaska was added to EIS Section 3.15.4, Other Terrestrial Mammals.	Y

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			and extinctions across the entirety of the Contiguous U.S. There is, therefore, a need to anticipate the future spread of this disease into Alaska and prioritize efforts to conserve the Alaskan stronghold for little brown bats (Meierhofer et al. 2021). This warrants further discussion and consideration in the FEIS.		
13670-3	Rachel Lord	Alaska Food Policy Council	Scoping Comment Not Addressed RE: Reindeer Grazing In the December 2022 Public Scoping Report, Chapter 3.24.3 a commenter asked for input from BLM around reindeer grazing in the proposed areas under consideration. The draft EIS does not appear to have addressed this comment, and we request BLM to consider this comment and publish the potential impacts on reindeer grazing across the analysis area. The reindeer industry has a vibrant history in the Bering Straits region, and is actively looking to an even brighter future. It is imperative that the EIS addresses this concern.	Text on the potential impacts on reindeer ranges was added to EIS Section 3.15.1, Caribou.	Y
13743-1	Christopher Lish		Lifting D-1 protections and opening these lands to extractive industrial development would fragment some of our country's last remaining intact landscapes, impact important salmon streams, and affect migratory corridors for large mammals and birds.	The potential impacts of development on fish and wildlife, including potential impacts of habitat fragmentation, are discussed in EIS Section 3.15, Terrestrial Mammals; EIS Section 3.7 Fish and Aquatic Species; and EIS Section 3.2 Birds and Special Status Bird Species.	N
13743-3	Christopher Lish		Connectivity is essential for migratory species like the Western Arctic Caribou Herd. This herd is one of the largest Alaskan caribou herds and undertakes one of the longest terrestrial migrations on the planet. It is currently facing an alarming decline and its health is critical to a functioning Arctic ecosystem.	Effects to caribou under each alternative are evaluated in EIS Section 3.15.1, Caribou. A map of the seasonal ranges of the Western Arctic herd was added as Figure 3.15-2 in Appendix A, Figures.	Y
13755-1	Leigh Honig	Bristol Bay Subsistence Regional Advisory Council	Subsistence users in the Bristol Bay Region will be highly impacted by changes to D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitats critical for species migrations and adaptation to our rapidly changing environment. Local communities that depend on caribou, salmon, moose, and other subsistence resources are already encountering reductions in populations. Harvesters have been restricted from hunting the Mulchatna Caribou Herd, an important subsistence resource in the Bristol Bay region, since 2021 due to conservation concerns.	The potential impacts of development on the Mulchatna herd and the decline in herd size are discussed in EIS Section 3.15.1, Caribou, and in EIS Section 3.14, Subsistence. The potential impacts of development on fish are described in EIS Section 3.7, Fish and Aquatic Species. Effects to moose from potential development are described in EIS Section 3.15.2, Moose.	N
13766-3	David Jonas	Alaska Homestead Adventures LLC	Alaska is already under stress from climate change and opening more land to mining and development would introduce more invasive species, degrade permafrost, and fracture intact habitat that is so vital to the Western Arctic Caribou herd, a vital resource for both subsistence and tourism.	The potential impacts of climate change, invasive species, permafrost, and habitat on the Western Arctic herd are discussed in EIS Section 3.15.1.2.7, Cumulative Impacts; EIS Section 3.16, Vegetation, Wetlands, and Special Status Plants; EIS Section 3.13, Soils and Permafrost; and EIS Section 3.15.1, Caribou.	N
13776-1	Linda Rutledge		In East Alaska we have seen the Nelchina Caribou Herd population drop from 35,000 to less than 10,000 animals in a two year period. Moose populations are in decline. Copper River salmon are smaller with erratic runs. These animals depend on large intact continuous landscapes which foster healthy habitats. Designating D-1 land for industrial mining, mineral extraction, and State ownership will fragment these important lands and cause harm. Wildlife needs our support, so please keep the protections in place that Alternative A now provides.	The potential impacts on moose, salmon, and Nelchina herd caribou are discussed in EIS Section 3.15.2, Moose; EIS Section 3.7, Fish and Aquatic Species; and EIS Section 3.15.1, Caribou.	N
13790-2	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	Furthermore, the protection of habitat connectivity is crucial for the health of our ecosystems. The 17(d)(1) lands serve as vital corridors for the migration and survival of various fish and wildlife species, particularly caribou which are declining across Alaska and worldwide. Loss of federal protections will result in disruption of these habitats, which would not only be detrimental to biodiversity, but also to the ecological balance that is essential for the well-being of all species.	The potential impacts on fish and wildlife species are discussed in EIS Sections 3.7, Fish and Aquatic Species, and EIS Section 3.15, Terrestrial Mammals. Additional text on habitat fragmentation was added to EIS Section 3.15, Terrestrial Mammals.	Y
13851-5	Margaret Stern	Susitna River Coalition	The health of the Nelchina Caribou herd is also of significant concern. The calving, migration, and summering grounds of the Nelchina herd are located within the bounds of the D1 Lands Withdrawals. Caribou are an ecologically, economically, and culturally important resource throughout Alaska. The population of the Nelchina herd, like other herds in Alaska, is suffering as a result of human induced climate change. In addition, it has been demonstrated that they are negatively impacted by human behavior. Intact and untouched ecosystems are vitally important to the continued survival of this important keystone species. Our organization worries about the effects of expanded human activity and habitat degradation as a result of expanded development.	A map of the seasonal ranges of the Nelchina herd was added to the EIS as Figure 3.15-3 in EIS Appendix A, Figures. The recent decline in the Nelchina herd and potential impacts of development on the herd are discussed in EIS Section 3.15.1, Caribou	Y
13909-1	Kip Kermoian, Patricia Kermoian		The Chilkat lands in particular are host to a complex of some of the most biologically diverse attributes anywhere in the state, and world, for that matter. Unique genetics among Mt goats in this region alone, harbor what could prove to be critical in the survival of these population in the face of numerous evolving pressures.	Though some of the decision area is adjacent to the Chilkat River, the focused analysis area does not include lands along the Chilkat River. Mountain goats are discussed EIS Section 3.15.4, Other Terrestrial Mammals.	N
13946-1	Benjamin Freitas	World Wildlife Fund	The Arctic, and the lands these areas include, supports a spectacular array of wildlife species, pristine and diverse breeding and feeding habitats, and numerous thriving Indigenous communities. The marine ecosystem surrounding some of these areas are inextricably linked to other systems around the planet by ocean and air currents and by the many species of birds, fish,	The potential impacts of development on fish and wildlife are discussed in EIS Section 3.15, Terrestrial Mammals; EIS Section 3.7, Fish and Aquatic Species; and EIS Section 3.2, Birds and Special Status Bird Species. The potential impacts on subsistence are discussed in EIS Section 3.14, Subsistence.	N

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			and marine mammals that migrate great distances through the course of their lives. Removing the D-1 protections for these lands poses severe threats to the Arctic's global importance as nursery and migratory grounds for numerous wildlife, and to the exceptionally productive marine ecosystems and fisheries of Bristol Bay, Bering Sea-Western Interior, East Alaska, Kobuk-Seward Peninsula, and Ring of Fire planning areas. Development in these areas, because of the widespread and irreversibly destructive impacts these activities could have on Arctic ecosystems, would also harm the people who depend on them.		
13957-2	–	Western Colorado University on Behalf of Students	On top of the impacts listed above, these subsistence communities will likely be facing more hardship in trying to hunt for food. The EIS mentions that large caribou herds are of great importance for subsistence hunting in Alaska. Yet, it is missing critical science on how new developments in mining operations can impact caribou populations. Caribou stop walking freely near and across roads at a threshold of 5 vehicles per hour, and show little sign of habituation in areas of development (Rosen, 2024). This shift in movement and increased traffic's impacts on populations, and in turn, subsistence hunting, only adds to the stress on these native communities and their cultural identity. This will force them to travel farther for resources or turn to buying food from stores, and only aid in the future generational cultural disconnect.	Discussion of Severson et al. (2023) has been added to the EIS. Effects to subsistence including food access, is discussed in EIS Section 3.14, Subsistence.	Y
13970-1	Jen Leahy	Theodore Roosevelt Conservation Partnership	For decades, these lands have been mostly closed to industrial development to protect the public interest. Opening large tracts of critical habitat to mining claims and conveyances could effectively privatize some of Alaska's finest habitat, which could have serious negative consequences to migratory species like caribou and salmon.	Potential impacts of development on caribou are discussed in EIS Section 3.15, Terrestrial Mammals, and potential impacts on salmon are discussed in EIS Section 3.7, Fish and Aquatic Species.	N
14030-1	Mary Glaves	Backcountry Hunters & Anglers	Opening these lands to development would rollback conservation and allow for industrial activity on 10% of all lands stewarded by the BLM, resulting in disturbances for migratory species like waterfowl, caribou and salmon, which are the basis of hunting and fishing traditions and an important food source for Alaskans. In addition to negative impacts to critical habitat, this could also restrict public access to some of Alaska's finest hunting and fishing opportunities.	Potential impacts of development on caribou are discussed in EIS Section 3.15, Terrestrial Mammal; potential impacts on waterfowl are discussed in EIS Section 3.2, Birds and Special Status Bird Species; and potential impacts on salmon are discussed in EIS Section 3.7, Fish and Aquatic Species. Potential impacts to access are discussed in EIS Section 3.11, Recreation and Transportation, and EIS Section 3.14, Subsistence.	N
14047-1	Christi Heun	Defenders of Wildlife	Connectivity is essential for migratory species like the Western Arctic Caribou Herd. This herd is one of the largest Alaskan caribou herds and undertakes one of the longest terrestrial migrations on the planet. It is currently facing an alarming decline and its health is critical to a functioning Arctic ecosystem. Maintaining landscape connectivity is a key tenet of wildlife ecology and a founding motive of the Biden Administration's America the Beautiful Initiative which aims "to conserve, connect, and restore lands and waters across the nation...and help combat climate change." Connectivity is a key strategy to protect biodiversity, maintain viable ecosystems for wildlife populations, and aid in wildlife movement. Movement is among the best tools wildlife have to facilitate adaptations to climate change. Movement is necessary for wildlife to access variable habitat, as habitat is rapidly changing. When habitat is fragmented by barriers, wildlife are unable to access portions of their range, which can inhibit major lifecycle events. In the case of caribou, this can limit their ability to access critical calving grounds, insect relief areas, and winter forage ranges.	A map of Western Arctic herd seasonal ranges was added to the EIS as Figure 3.15-2 in EIS Appendix A, Figures. The potential impacts of development on caribou movements are discussed in EIS Section 3.15.1, Caribou.	Y
14069-1	Derek Poinsette	Takshanuk Watershed Council	We ask that the BLM maintain protections on all D1 lands, and choose the no action alternative in the EIS. Of particular concern to us here in the Chilkat Valley are the roughly 250,000 acres of D1 lands right here in our home watershed. These lands support one of the most prolific and genetically-diverse populations mountain goats in Alaska. Mountain goats are threatened by changes in habitat driven by climate change, and large conservation areas, such as these D1 lands here in the Chilkat Watershed, are vital for the long term survival of the species.	Text on potential impacts to mountain goats and Dall sheep was added to EIS Section 3.15, Terrestrial Mammals.	Y
14113-1	Loretta Brown	SalmonState	In a time of rapid environmental change, it is imperative that we preserve the intact landscapes that offer refugia to vulnerable species.	The potential impacts of climate change and development are discussed in EIS Sections 3.15, Terrestrial Mammals, and EIS Section 3.2, Birds and Special Status Bird Species.	N
14315-1	Michael Sakarias		Allowing fragmentation of Alaska's last remaining intact landscapes and wild lands would affect migratory corridors for caribou and birds.	The potential impacts of development on wildlife and habitat fragmentation are discussed in EIS Section 3.2, Birds and Special Status Bird Species, and EIS Section 3.15, Terrestrial Mammals. Additional text on habitat fragmentation was added to EIS Section 3.15, Terrestrial Mammals.	Y
14414-18	Sarah Obed	Doyon, Limited	While the DEIS accurately states that the wood bison in Alaska are designated as an experimental population under Section 10(j) of the Endangered Species Act, BLM should further clarify that the designation is <i>nonessential</i> . DEIS, p. 3-261. A nonessential experimental population ("NEP") is "by definition not essential to the continued existence of the species." <i>Endangered and Threatened Wildlife and Plants; Establishment of a Nonessential Experimental Population of Wood Bison in Alaska</i> , 79 Fed. Reg. 26175, 26176 (2014). "An NEP designation provides important assurances to stakeholders and the State of Alaska regarding regulatory compliance requirements relating to a listed species. This conservation effort would not occur without such assurances." 79 Fed. Reg. at 26184.	The text was updated to state that the wood bison population is nonessential and therefore not essential to the continued existence of the species.	Y

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			The presence of the wood bison NEP should not in any way impact BLM's decision whether to revoke the 17(d)(1) withdrawals. It appears that this is the case based upon the DEIS's statement that "No acres of wood bison range would be impacted in the focused analysis area for any alternative (Table 3.15-14)." DEIS, p. 3-265. In any event that BLM does consider impacts to wood bison to be relevant to its decision here, however, it must fully consider the fact that the designation is as an NEP.		
14414-19	Sarah Obed	Doyon, Limited	With regard to wood bison, BLM also should fix the statement that "[p]otential impacts to subsistence harvest would be <i>minimal</i> because wood bison harvest is not currently allowed;" DEIS, p. 3-263 (emphasis added). Foreseeable potential impacts to subsistence harvest would not be minimal; they would be non-existent.	Describing the potential impacts as minimal is accurate because, although harvest is not currently allowed, it could be allowed in the future.	N
14426-1	Scott Chandler		This EIS also clearly does not grasp the importance of these lands as critical habitat for migratory and endangered species, and as vital subsistence landscapes for rural Alaskans. It does not adequately address the degree to which possible development in this region will impact these resources, it just equates wildlife and culture to an acre of land. Different development options affect different species and different landscapes variably, so by not considering what could be placed on these withdrawals it is being shown that improper assessment of the scale of these landscapes is occurring.	The EIS and RFD (see EIS Appendix D) discuss which parcels are more likely to be developed and which areas are more likely to have different types of development. The EIS also describes how different types of development may have different potential impacts on wildlife species. At this point, which development projects would actually proceed on different parcels of land under different alternatives is unknown on a parcel-by-parcel basis.	N
14485-1	Craig Michaelis		Opening these lands to development would rollback conservation and allow for industrial development on 10% of all lands stewarded by the BLM, resulting in disturbances for migratory species like waterfowl, caribou and salmon, which are the basis of hunting and fishing traditions and an important food source for Alaskans. In addition to negative impacts to critical habitat, this could also restrict public access to some of Alaska's finest hunting and fishing opportunities.	The potential impacts of different types of development on fish and wildlife are described in EIS Section 3.2, Birds and Special Status Bird Species; EIS Section 3.7, Fish and Aquatic Species; and EIS Section 3.15, Terrestrial Mammals. The potential impacts on subsistence hunting and fishing are discussed in EIS Section 3.14, Subsistence. The potential impacts on access are described in EIS Section 3.11, Recreation and Travel Management.	N
14563-3	Michael Spindler		The final D1 EIS should document and cite all of the specific connectivity corridors that were identified during pre-planning efforts for the BSWI RMP (see BSWI-specific connectivity data sets on USGS-ScienceBase that were provided to BLM by D. Magness). The D1 DEIS and final BSWI plan are not adequately cross-referenced in regards to habitat connectivity; the final D1 EIS should include this cross-referencing. The final D1 EIS and should map and document the "North Connectivity Corridor" and "South Connectivity Corridor" identified in the final BSWI plan to retain connectivity between National Wildlife Refuges and nearby BLM lands (see BLM 2021 Map A-10). The final D1 EIS should describe how the range of alternatives specifically addresses extent of withdrawal retentions made for habitat connectivity.	The wildlife connectivity corridor data are available only for the BSWI planning area, and therefore provide limited information for the decision maker. Furthermore, Alternatives A, B, and C retain all the withdrawals that overlap the connectivity corridor in BSWI. Only Alternative D would revoke 17(d)(1) withdrawals that overlap the connectivity corridor in BSWI. Therefore, the connectivity corridor from the BSWI RMP was not included in the EIS. A general discussion of habitat connectivity was added to EIS Section 3.15.4, Other Terrestrial Mammals.	Y
14563-5	Michael Spindler		During pre-planning efforts for the Central Yukon RMP (CYRMP) BLM participated in and supported studies by Magness et al. 2018 that identified wildlife connectivity corridors between CYRMP BLM lands and adjacent National Wildlife Refuge lands (e.g. Koyukuk, Nowitna, Innoko, Arctic, and Selawik) and National Park lands (Gates of the Arctic and Denali). These "CYRMP-neighborhood" analyses were apparently "siloed" and not considered in relationship to the BSWI planning area. It is my suggestion that BLM coordinate with Alaska US Fish and Wildlife (specifically Dawn Magness and Emily Yurcich) to run the analyses connecting the northern BSWI area to Selawik and Koyukuk NWRs, and perhaps beyond. I am told by Dawn Magness (pers comm.) that this would be relatively easy to do. It appears to me that the D1 DEIS does not adequately consider a "bigger picture" of connectivity beyond the five included RMPs (Bay, BSWI, Kobuk-Seward, Ring of Fire, and East), even though the CYRMP area is directly adjacent. BLM recognized the latter RMP is still in process, but did not consider the CYRMPs huge amount of information pertinent to habitat connectivity right next to the D1 study area. It appears to this reviewer that some complexities and/or interactions exist between the final BSWI RMP and the draft CYRMP, and that the D1 DEIS, may not have been adequately coordinated with the latter. For the final D1 EIS, BLM should propose that all identified connectivity corridors and ecological benchmarks included in the above references be incorporated into Alternative B. Blocks of D1 withdrawals within all identified connectivity corridors should be 100% retained for Alternative B. And, a smaller subset of the most important connectivity corridors and ecological benchmarks should be retained in Alternative C.	See response to comment 14563-3.	Y
14581-2	Becky Long		A recent study by the U.S. Geological Survey regarding caribou herds on the North Slope can be applied to the Nelchina Herd if industrial infrastructure occurs in their range. The new study has shown that caribou are very sensitive to human activity more than we previously recognized. The study adds to the growing body of evidence that caribou are much more bothered by infrastructure and industrial activity. Such development has a "barrier effect" which causes longer migratory delays. Potential effects range from an individual animal's body condition, reproductive success, and total population size. Calves are smaller affecting their survival rate.	Discussion of Severson et al. 2023 was added to EIS Section 3.15.1, Caribou.	Y

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			The conclusion that one can come to is that when development and infrastructure occurs in a place that affects subsistence, it does not ever change back to the way it was. The D-1 protections are necessary for the herd to recover. Such recovery could be long as 15 years. The range forage also needs the time to recover.		
14590-3	Denis Ransy		And specifically the no action alternative is necessary for the East Alaska Unit of the D1 lands. Most of this unit is in habitat for the Nelchina Caribou Herd. The herd is badly depleted. Industrial development and infrastructure will make it harder, if not impossible, to recover.	The recent decline in the Nelchina herd and potential impacts from development on the herd are discussed in EIS Section 3.15, Terrestrial Mammals. Retaining all withdrawals in BLM management is evaluated under Alternative A (EIS Section 2.2, Alternative A).	N
14630-8	Emily Johnson	National Park Service	The NPS also requests the BLM consider and review the identified literature for this analysis (attached). [Literature provided in letter 14687]	This literature was reviewed and incorporated as appropriate into EIS Section 3.15, Terrestrial Mammals.	Y
14640-1	Kirsti Jurica		Fish and wildlife stocks are declining state-wide so it is paramount to keep valuable habitat unfettered. Robust populations rely on access to a diverse mosaic of habitats for all seasonal conditions and life stages especially during these times of environmental change. Even the smallest development and resource road building leads to habitat fragmentation and can have drastic long-lasting effects.	The potential impacts of roads and other development on wildlife movements are discussed in EIS Section 3.15, Terrestrial Mammals. Effects to fish are discussed in EIS Section 3.7, Fish and Aquatic Species.	N
14641-42	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM has access to available data and has identified important moose habitat across the ANCSA 17(d)(1) lands in various resource management planning processes. The final analysis would benefit from incorporating those data layers and maps into the final EIS to provide supporting information on important overwintering, calving, and breeding habitat for various moose populations. Moose are an important subsistence resource and the distribution of moose populations is critical to supporting access to resources for rural communities.	See response to comment 13600-10.	N
14641-43	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Dall sheep habitat is located throughout the ANCSA 17(d)(1) lands under review and impacts to Dall sheep populations could be substantial if the withdrawals are revoked. Notably, Dall sheep are sensitive to disturbance. According to Phillips et al. 2010, Dall sheep in Denali responded negatively to increased traffic volumes by increasing their movement rates when approaching the road and shifting away from the road at higher traffic levels. While many studies have investigated the potential for vehicles to affect sheep behavior and distribution, most have examined individual or group responses to the approach of individual vehicles, or general distribution of sheep relative to road corridors, rather than volume or patterns of traffic. Our results reflected a threshold distance for response to disturbance by showing that sheep within 300 meters (984 ft) of the road shifted farther away at higher traffic volumes and that small increases in the number of vehicles on the road could have impacts on Dall sheep movements. Movement of sheep away from the road corridor at higher traffic volumes may decrease the amount of habitat available for foraging. This may be most relevant to sheep during the spring season, when they most frequently cross the road and green-up has not yet occurred at higher elevations. In addition to the potential of increased disturbance due to the development scenarios, the habitat for Dall sheep is already shrinking as the elevation of the treeline in alpine areas is encroaching on the habitat of alpine species such as collared pika and Dall sheep. The DEIS recognizes that portions of the analysis area may be undergoing rapid alterations due to climate change, which could impact terrestrial mammals in multiple ways and act synergistically with development to limit the ability of terrestrial mammals to adapt to changes in the climate and anthropogenic impacts.	Additional text on potential impacts on Dall sheep from climate change and development was added to EIS Section 3.15.4, Other Terrestrial Mammals.	Y
14641-44	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center;	In November 2023, the U.S. Fish and Wildlife Service designated wolverines in the contiguous United States as a threatened species, due primarily to the ongoing and increasing impacts of climate change and associated habitat degradation and fragmentation. Alaska wolverines are increasingly facing the same challenges. Wolverines are a snow dependent species that require large expanses of intact, connected habitat, and therefore, maintaining the ANCSA 17(d)(1) withdrawals is particularly important. All maternal wolverine dens are located in areas that retain snow through the spring, and there is no evidence, either currently or historically, that wolverine populations can persist in areas without a sustained spring snowpack. While literature is sparse on the projected changes to Alaskan wolverine habitat changes, warming temperatures are expected to shrink the mountain snowpack wolverines rely on for hunting and denning in the contiguous	See response to comment 14641-40. In addition, wolverines and the importance of snow for maternal denning are discussed in draft EIS Section 3.15, Terrestrial Mammals; additional text on wolverines and potential habitat fragmentation was added.	Y

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		Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	United States. By the late 21st century, dispersal modeling indicates that habitat isolation at or above levels associated with genetic isolation of wolverine populations becomes widespread. Overall, we expect wolverine habitat to persist throughout the species range at least for the first half of the 21st century, but populations will likely become smaller and more isolated. The DEIS recognizes that large carnivores (brown bear, wolf, and wolverine) are likely to be among the species most negatively impacted by cumulative impacts because of their need for large ranges and susceptibility to human disturbance and harvest. As islands of habitable alpine and tundra communities begin to melt, wolverines will require passage to higher elevations with snowy areas to find adequate denning habitat with a sustained spring snowpack. In light of the climate challenges that face this snow-dependent species, habitat connectivity and the retention of the ANCSA 17(d)(1) withdrawals is more critical now than ever.		
14642-1	Tristen Pattee; Merle Custer	Kobuk Valley National Park Subsistence Resource Commission; Kobuk Valley National Park Subsistence Resource Commission	Subsistence users in the Northwest Arctic (Kobuk-Seward region) will be highly impacted by BLM's decision on whether to maintain the D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitat needed for species migration and adaptation to our rapidly changing environment. Communities that depend on caribou, salmon, moose and other subsistence resources are already encountering reductions in populations.	The potential impacts of roads and other development on large mammals are discussed in EIS Section 3.15, Terrestrial Mammals. The potential impacts to fish are discussed in EIS Section 3.7, Fish and Aquatic Species. The potential impacts on changes to fish and wildlife are discussed in EIS Section 3.14, Subsistence.	N
14655-2	Karmen Monigold		And one of the main Inupiaq staples is the bearded seal. In the fall the young seals, whether it's bearded or spotted, which are endangered species, go to the mouth of the Kobuk and the mouth of the Noatak to feed on the abundance of food, whatever they eat, and they get fat. And then when winter hits they're ready. So this would impact our endangered species that we rely on heavily as Inupiaq people. Not just for ourselves, but for the families that we share with.	The changing of land status would not directly impact bearded seals. Future large development projects that could impact bearded seals would be subject to evaluation under the requirements of NEPA and Marine Mammal Protection Act.	N
14681-8	Emily Johnson	National Park Service	Chapter 3, Section 3.15.1.1, Pg. 3-241, Paragraph 2, Line 1 says "Caribou have one of the lowest energetic costs of locomotion of any terrestrial animal" (Fancy and White 1987). NPS requests that BLM acknowledge in the EIS that 1) this study had a very small sample size of 6 caribou, 2) the net energetic cost of locomotion was determined for caribou walking on treadmills and not in snow, 3) this study also found that the cost of locomotion in snow increased exponentially with depth, and 4) energetic costs also increased in crusted snow. Snow is present for much of the year throughout the Western Caribou Arctic Herd's (WACH) range. Additionally, the cited study also found that caribou with shorter legs expend more energy in locomotion. Therefore, calves must invest greater energy in locomotion than their adult counterparts. Given that climate change will likely increase snowfall in numerous areas within the caribou range and increase crusting by increasing within-season variability in temperatures, caribou may need to expend more energy in the future to travel. This could affect their abundance, distribution, health, reproductive success, and recruitment particularly if coupled with the removal or alteration of core habitat.	Text explaining that energetic costs of moving through deep snow was added to EIS Section 3.15, Terrestrial Mammals.	Y
14681-13	Emily Johnson	National Park Service	17(d)(1) lands directly west and north of Lake Iliamna have significant overlap with the historic Mulchatna Caribou Herd (MCH) range. These areas were used significantly in the 1980s and 1990s by MCH and subsistence users (Van Lanen, James M., Gayle Neufeld, and Chris McDevitt. 2018. Traditional Ecological Knowledge of the Mulchatna Caribou Herd: Phenology, Habitat Change, Subsistence Use, and Related Species Interactions in Game Management Units 9B-C, 17, 18, and 19A-C, Alaska. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 441, Anchorage.). Dramatic declines in MCH have lessened current use in this area as overuse, climate, and other factors are currently impacting the herd. Retaining the 1.9 million acres in the herd range of the MCH without development is important for the herd and local residents. The NPS has included sources for BLM to consider to strengthen the impact analysis to the Mulchatna Caribou Herd.	The EIS describes the areas in the focal analysis area as "In the summer and winter range of the Mulchatna herd, largely on the eastern or western periphery of the range." This still appears to be accurate based on maps in Van Lanen et al. (2018). Effects to caribou and subsistence are described in EIS Section 3.15.1, Caribou, and EIS Section 3.14, Subsistence.	N
14681-14	Emily Johnson	National Park Service	17(d)(1) lands directly west and north of Lake Iliamna are used extensively by brown bears that den within Lake Clark National Park and Preserve (LACL). Research shows the heterogeneity in habitat (Mangipane L. S., J. L. Belant, T. L. Hiller, M. E. Colvin, D. D. Gustine, B. A. Mangipane, and G. V. Hilderbrand. 2018. Influences of landscape heterogeneity on home-range sizes of brown bears. Mammalian Biology 88: 1-7) and salmon numbers/timing of the broader area helps support the high density of bears. Retaining these lands in a natural state will continue to provide connectivity between high-quality habitats for brown bears/wildlife on private, state, and federal lands in the region. The NPS has included sources for BLM to consider to strengthen the impact analysis to the connectivity of brown bear habitat.	See response to comment 14681-15 for details on brown bear.	Y
14681-15	Emily Johnson	National Park Service	17(d)(1) lands directly adjacent to Lake Clark National Park and Preserve (LACL) on the east side of the park adjacent to Redoubt Creek are denning habitat for brown bears in that area. Unpublished LACL data from the 1980's documented dens in those parcels and given the high numbers of bears, contiguous habitat, and the importance of the LACL salt marshes to bears in the region (Schmidt, J. H., Wilson, T. L., Thompson, W. L., and Mangipane, B. A. 2022. Integrating	Additional text on potential impacts to brown bear in Southwest Alaska was added to EIS Section 3.15.4, Other Terrestrial Mammals.	Y

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			distance sampling survey data with population indices to separate trends in abundance and temporary immigration. Journal of Wildlife Management 86:e22185. https://doi.org/10.1002/jwmg.22185). Retention of these lands in an undeveloped state helps ensure this resource remains at populations that support bear-viewing and sport hunting in the area. The NPS has included sources for BLM to consider to strengthen the impact analysis to brown bear habitat.		
14681-31	Emily Johnson	National Park Service	Glacier Bay National Park (GLBA) is commenting on the approximately 69,000 acres that abuts the northeast side of the park and is the northern and eastern slope of Takhinsha Mountains. This area is referred to as the Southern Block in the Haines Amendment (2020) to the BLMs Ring of Fire Resources Management Plan (Haines Amendment). This Southern Block has two geographically distinct areas: the northern triangle and the southern polygon. Four glacial carved valleys (Bertha, Willard, Dickson, and unnamed) descend to the north from Takhinsha ridge forming the northern triangle (approx. 35,000 acres) and each drainage had approximately one mile of unglaciated valley by 2020. The southern polygon (approx. 34,000 acres) surrounding the Davidson icefield is entirely above 3,000 feet; the ice is likely thinning; however, the ice extent is similar to what was observed in 1986. The NPS is most concerned about our Mountain Goat (<i>Oreamnos americanus</i>) populations in these areas. The small mountain goat populations within the park share genetic material with the more genetically diverse populations in the Tsirku, Taklin, Chilkat, and Chilkoot river valleys. Glacier Bay's populations will likely decline under most climate change scenarios (Young, 2022). We believe some animals cross the Takhinsha Mountains and increase the genetic diversity of our populations thereby giving them more ability to adapt to a changing climate. The Haines Amendment allows commercial heli-skiing in the BLM Extensive Recreation Management Area (ERMA); however, there are a maximum number of flights and the plan curtails heli-skiing in certain months to protect mountain goats. Mountain goats tend to flee from helicopters which leads to unnecessary expenditure of energy and sometimes leads to mortality from falls (White, 2017). Researchers have found that "mountain goats had a very high probability of being moderately or strongly disturbed when they were approached within 500 m by helicopters... but these probabilities were 2-5 times lesser when the approach distance was 500 m - 1500 m (Cote, 2013). The NPS contends that heli-skiing regulated by the BLM will better protect the mountain goat populations living in the Takhinsha Mountains than revoking the withdrawals and switching to non-federal management.	Text on mountain goats was added to EIS Section 3.15.4, Other Terrestrial Mammals, to address mountain goats and heliskiing.	Y
14681-33	Emily Johnson	National Park Service	Brown bears (<i>Ursus arctus</i>) with radio collars moved between the Park and BLM lands between 2018 and 2022 (Crupi 2020, 2023). Migration across the Takhinsha range allows for dispersal and increases the genetic diversity of Glacier Bay brown bears. Several of these female brown bear den within the southern block proposed to be opened. Four glacial carved valleys (Bertha, Willard, Dickson, and unnamed) descend to the north from Takhinsha ridge. They were completely glaciated 25 years ago, but now each have approximately 1 mile unglaciated valley. These valleys, and the entire northern triangle, will continue to provide additional wildlife habitat with each passing year. Heli-skiing and heli-tourism can disrupt hibernating bears and mothers with young cubs. When helicopters pick-up skiers at the end of their descent they might disturb the female brown bears and their newborn cubs. To protect brown bear habitat the NPS would prefer the BLM not open especially the northern triangle of this plot of land. The development of a mine for locatable minerals is a possible future activity that will likely lead to more roads, more hunting pressure, and more accidental deaths by vehicle collisions.	Edits were made to EIS Section 3.15.4.1, Other Terrestrial Mammals, Affected Environment, to discuss the importance of these areas to brown bear.	Y
14684-1	Cyrus Harris		The lifting of (d)(1) protections on these lands will definitely affect the caribou migration route and habitat, the Western Arctic Caribou Herd that we rely on and use as our main source of meat. All of our traditional foods will be highly affected since the majority of these BLM (d)(1) lands are a part of their overall range. The Western Arctic Caribou Herd has shrunk by an estimate of 22 percent in the past -- last few years. We cannot risk any further disruption. Caribou will start detect- -- detecting the noise from these human activities from miles away.* They'll get closer, cautiously -- cautiously heading in that direction, but they'll be hesitant to cross. This has already been proven to happen through scientific studies. This is what the indigenous folks said would happen. There are many more consequences that could come with the potential lifting of these BLM (d)(1) land's -- protections on these lands. They would affect not just caribou, but also migratory birds, waterfowl, and fish species of all sorts, as well as edible plants.	The potential impacts of roads and other development on caribou migration are discussed in EIS Section 3.15.1.2.2, Impacts Common to all Action Alternatives. Impacts to subsistence resources are described in EIS Section 3.14, Subsistence.	N
14704-2	Charlie Brown		So, you know there's a lot of concern about these lands. Hunting is a -- a big part of our - our livelihood too. And so you mentioned something about areas that land are used for hunting. You know, a lot of these lands are outside of our Native corporation boundaries, so we depend a lot on state lands, federal lands that go outside of our Native ownership boundaries, you know. And this -	The potential impacts on caribou migration are discussed in EIS Section 3.15.1.2.2, Impacts Common to All Action Alternatives. Retaining all withdrawals in BLM management is evaluated under Alternative A (EIS Section 2.2, Alternative A).	N

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			- this has been part of our way of life since before statehood even, before any of this Native Claim Settlement has been happening. And, you know, it's -- it's really concerning because that caribou migration is being affected by a lot of development, and regions - that happening up on the North Slope -- what's happening up there with the, you know, oil and gas development, and all those things happening up there. What are the chances of putting some of these lands into protection status, such as -- I know there's a wildlife refuge in some of those -- some areas in close proximity, and, you know, in parts of Alaska, but what -- what kind of protection for that caribou migration to -- to be intact, you know, because with certain types of development that can also have a huge impact on that caribou migration.		
305-2	Eileen Dunn		Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds. With so many future uncertainties upon fish and wildlife and IN PARTICULAR Alaska Native communities, it makes good sense to take a precautionary approach to public land management and PRESERVE our Nation's last best places for generations to come.	See response comment 3534-3.	N
3534-1	Joanne Kelly		Never,mind that Alaska's BLM D-1 lands support an abundance of biodiversity found in very few places remaining globally, but we are in the middle of a climate crises and have a desperate need to protect our ecosystems such as BLM D-1!	While the resources that make up the biodiversity of the decision area are broken out into individual resources, like EIS Section 3.15, Terrestrial Mammals; EIS Section 3.2, Birds and Special Status Birds; and EIS Section 3.7, Fish and Aquatic Species, the EIS as a whole will inform the decision maker on the effects to biodiversity is considered in the context of knowing climate change is occurring. Retaining all withdrawals in BLM management is evaluated under Alternative A (EIS Section 2.2, Alternative A).	N
3534-3	Joanne Kelly		As to the biodiversity of BLM D-1, lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds.	The potential impacts of development on large mammals and their movement are discussed in EIS Section 3.15, Terrestrial Mammals; the potential impacts on birds are discussed in EIS Section 3.2, Birds and Special Status Species; and potential impacts to fish are discussed in EIS Section 3.7, Fish and Aquatic Species. See response to comment 14641-40 for additional discussion about habitat connectivity.	N
46-1	Barbara Farris		Opening these lands could harm wildlife including caribou and salmon.	Potential impacts on terrestrial mammals are discussed in EIS Section 3.15, Terrestrial Mammals. Potential impacts on fish are discussed in EIS Section 3.7, Fish and Aquatic Species. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
5963-1	Ralph Myer		Currently Alaska's BLM D-1 lands support an abundance of biodiversity found in very few places remaining globally. Lifting the D-1 protections and opening the lands to industrial development would inordinately fragment some of our last remaining intact landscapes. In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations & their migratory patterns.	The affected environment for terrestrial mammals and potential impacts on terrestrial mammals and movement are discussed in EIS Section 3.15, Terrestrial Mammals. Potential impacts on fish are discussed in EIS Section 3.7, Fish and Aquatic Species. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2). See response to comment 14641-40 for additional discussion of habitat connectivity.	N
6526-1	Debra Patla		I am deeply concerned about your intentions to remove protections from Alaska's BLM D-1 lands, which are of great value for biodiversity, including migratory ungulates and birds and salmon. In the midst of climate change, you should be increasing protection of high quality wild lands, not removing it.	See response to comment 6717-1.	N
6717-1	Karen Nguyen		I am emailing to urge you to keep the protections for Alaska's BLM D-1 lands. These beautiful uncharted native environments are home and protect abundance of biodiversity. Many vast places have been destroyed so it's imperative that we protect the few untouched places that are remaining. By lifting D-1 protections and opening the lands to industrial development, we will kill the homes and migratory paths of billions of animals.	The potential impacts on terrestrial animals are discussed in EIS Section 3.15, Terrestrial Mammals. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
7711-1	Cathy Teich		The Nelchina caribou herd has gone from 80,000 6 years ago to 11,000 today. This herd is just one of the reasons it is important to leave the D-1 lands as they are.	The decline of the Nelchina herd to fewer than 9,000 animals is discussed in EIS Section 3.15.1.1, Affected Environment. Retaining the withdrawals in BLM management is considered in Alternative A (EIS Section 2.2).	N
9833-4	Becky Long		The No Action Alternative for the East Alaska unit is necessary for the very survival of the important Nelchina Caribou Herd. Figure 3.15-1 in the Appendix A of the draft EIS shows a majority percentage of the East unit is the range of this herd. This includes their migratory routes, calving areas and wintering and summer areas. This information is from the Alaska Department of Fish and Game. This herd is unique. The herd spends summers and fall in the highly accessible Game Management Unit 13 which is located off the road system between Fairbanks, the Mat Su Valley and Anchorage. Indeed, GMU 13 is an important hunting area for many Alaska residents yearly. Due to the many vagaries of the changing climate conditions, wintering adult and calf mortality have been high the past three years. This has led to a severe population decline and low recruitment rate. The fall of 2022 population estimate was 17,433.	The recent decline of the Nelchina caribou as well as potential impacts from roads and other development are discussed in EIS Section 3.15.1.1, Affected Environment, and EIS Section 3.15.1.2.2, Impacts Common to all Action Alternatives. How changes in caribou abundance or availability could impact subsistence hunters is discussed in EIS Section 3.14, Subsistence. Information from Severson et al. (2023) was added to EIS Section 3.15, Terrestrial Mammals. The Nelchina herd currently crosses several highways during fall and spring migration.	Y

Terrestrial Mammals					
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			<p>ADFG's statistics show the latest herd population estimate is 8,823. Thus, there is no harvestable surplus. ADFG emergency order on 6/30/2023 has closed GMU 13 hunts including both tier 1 and community subsistence hunts. This means no state hunts in one of the most popular residential hunting areas in the state. Also lifting the D-1 protections would remove the federal subsistence priority affecting the subsistence resources.</p> <p>A recent study by the U.S. Geological Survey regarding caribou herds on the North Slope can be applied to the Nelchina Herd if industrial infrastructure occurs in their range. The new study has shown that caribou are very sensitive to human activity more than we previously recognized. The study adds to the growing body of evidence that caribou are much more bothered by infrastructure and industrial activity. Such development has a "barrier effect" which causes longer migratory delays. Potential effects range from an individual animal's body condition, reproductive success, and total population size. Calves are smaller affecting their survival rate.</p>		
14842-13	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	<p>... five ESA-listed species, the polar bear (<i>Ursus maritimus</i>), the spectacled eider (<i>Somateria fischeri</i>), the Steller's eider (<i>Polysticta stelleri</i>), the wood bison (<i>Bison bison athabascaae</i>), and the northern sea otter (<i>Enhydra lutris kenyoni</i>; southwest Alaska stock) may occur within the Action area. The wood bison is listed as a Nonessential Experimental Population under section 10(j) of the ESA. Wood bison do not have designated critical habitat, and no Section 7 consultation is necessary at present... map figures depict Selections and Top Filings near the coasts of the Chukchi Sea, Bering Sea, and Prince William Sound. Therefore, we also suggest coordinating the Action with Service's Marine Mammal Management staff regarding polar bears, Pacific walruses (<i>Odobenus rosmarus</i>), and northern sea otters. Increased human activity including vessel or aircraft traffic associated with the Action has the potential to disturb marine mammals, and walrus haulouts are particularly vulnerable to disturbance.</p>	<p>See EIS Section 1.8.4, Endangered Species Act Consultation. Informal consultation under Section 7 of the ESA between the BLM and USFWS for species listed under the ESA was completed on March 11, 2024. The USFWS concurred with the BLM's determination that the project is not likely to adversely affect the ESA-protected species.</p> <p>Effects to wood bison are analyzed in EIS Section 3.15.3. Pacific walrus or walrus haulouts and northern sea otter are not located within the decision area.</p>	N

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10116-1	-	Alaska Wilderness League	<p>3.1.1 Analysis Methods and Assumptions Paragraph two in this section states "Although it is impossible to predict exactly where and how much mining activity may occur, this analysis ASSUMES (emphasis added) that such mining activity would occur on lands with high mineral potential and PROXIMITY TO EXISTING ACCESS OR INFRASTRUCTURE (emphasis added)." It further goes on to state "For these reasons, the descriptions of impacts of mineral development in this EIS are necessarily general." The assumption in this section is an erroneous one, and any further analysis in this DEIS should be considered to be flawed, if this assumption is applied to the analysis and conclusions. Perhaps the DEIS should define the term "Proximity to existing access or infrastructure." The State of Alaska is pushing hard to open state lands to mining. It is going so far as to actually build the roads for the mines, prior to the mines being permitted, in the instance of the Ambler Road. In looking at some of the current projects around the state, it is apparent that many of the current mining projects have built or are planning extensive road systems to access the site and to haul the minerals to a port. They are in no way in proximity to existing access or infrastructure (except in a few cases where they plan to convert the Alaska Highway system into mining haul roads, with strong objection from the public but without objection or a public comment process from the State of Alaska). These access roads greatly increase the footprint of the project and increases its detrimental impacts to the environment, to the movement of migrating wildlife and subsistence resources and users. Here are but a few: A. 800 miles. Alaska Liquified Natural Gas Pipeline (AKLNG) B. 211 miles. Ambler Road - from the proposed (yet to be permitted mines sites) to the Dalton Highway. In addition the mining in this proposed district will impact 161 miles of the Dalton Highway. C. 240 miles. Manh Choh Mine - from the mine site to the refining site at Fort Knox. They will convert the Alaska Highway, a public access road for Alaska residents and the Alaska Tourist Industry into a mining haul road. After the ore is processed it will then transported to the Port of Anchorage. No EIS process has been completed to analyze the impacts of this project. D. 30 miles (or more). Donlin mine access road between mine site and port. E. 110 miles. Susitna Road. Originally proposed as 110 miles access road to mineral deposits. Currently being repackaged as shorter access road for hunting and fishing.</p>	<p>See response to comment 13600-2. A definition for the proximity to existing infrastructure is provided in the RFD Section 2, Leasable Minerals, and RFD Section 4, Salable Minerals, in EIS Appendix D.</p>	N

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			<p>F. 20 miles. Graphite One mine proposal in Nome. Current discussion to increase the footprint of the mining activity to make it more marketable. Will utilize local state highways as haul roads, to truck ore 55 miles between mining road and Port of Nome.</p> <p>G. 82 miles. Pebble Mine. Proposed access road between the mine and the port.</p> <p>H. 52 miles. Red Dog Mine. Transport between mine and port.</p> <p>1,545 miles = Total miles of access routes to known projects listed above. For those who are part of the Alaska Airlines Mileage Program, that distance should be familiar as it is slightly more than the distance between a flight between Anchorage and Seattle (1,434 miles). This figure does not even factor in acreage of actual acreage of the mines. Granted not all of these miles will be on the lands being considered within this DEIS, but it does make a point that mining activity and development in the State of Alaska is not necessarily within PROXIMITY TO EXISTING ACCESS OR INFRASTRUCTURE. The aggressive efforts currently underway, to build roads throughout Alaska harkens back to a quote by former Lt. Governor Jack Coghill (or Governor Walter Hickel, depending which source you consult) that the road map of Alaska should look like a plate of spaghetti.</p>		
13211-9	Caitlin Roesler	US Environmental Protection Agency Region 10	In November 2022, the Office of Science and Technology Policy (OSTP) and the CEQ released Guidance for Federal Departments and Agencies on Indigenous Knowledge (OSTP and CEQ Indigenous Knowledge Guidance) on considering, including, and applying indigenous knowledge in federal decision-making. EPA recommends that the FEIS reference this guidance and describe if traditional knowledge was utilized to help inform the affected environment and analysis of impacts to subsistence and other resources. EPA notes a Tribal Alternative that integrated traditional knowledge among all affected Alaska Native communities was not carried forward for detailed analysis due to its similarities to Alternative B. We recommend the FEIS incorporate this traditional knowledge into the analysis.	See response to comment 12994-1. The BLM supports inclusion of Indigenous knowledge in NEPA processes, as called for in the OSTP guidance that the commenter referenced, Secretarial Order 3403, and BLM policy.	Y
13628-25	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The FEIS should include a table (or map layer on the interactive map) for readers to compare the D1 PLOs with regional RMPs to identify and understand what restrictions would apply under the RMPs in terms of development restrictions and wildlife management objectives if D1 Withdrawals are revoked, along with these such restrictions and objectives would occur. These PLO data are available in the Maps Data tab on the BLM ePlanning project website, but are not readily accessible for public viewing as they can only be visualized using a GIS platform.	The interactive webmap is available online and does not require the viewer to have a GIS platform.	N
13927-1	Kaija Klaunder		I am writing to support the No Action alternative, both because of the many negative effects of the action alternatives, and because of the many unknown impacts that were not able to be quantified by this EIS statement. It is my opinion that attempting to quantify impacts over so many acres in so many parcels in the scope of a single EIS is not appropriate, and that the public would be better served by having EISs conducted, if not at the parcel level, at least at the planning area. This would allow for more in-depth and accurate quantification of metrics like subsistence use areas and trends of fish and wildlife species.	An appropriate analysis area was defined for each resource analyzed in the EIS. While the decision area includes approximately 28 million acres, each resource section identifies a more suitable analysis area and identifies impacts by planning area as appropriate. This approach to analyzing resources impacts is sufficient to disclose impacts in the EIS. The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. One EIS is sufficient to disclose resource impacts to these actions across 28 million acres.	N
14167-7	Olivia Karns	Tanana Chiefs Conference	<p>In agreement with an emphasis on conservation of habitat for the enhancement of salmon populations are Tribal perspectives on the climate crisis that favor the conservation of land, water and related natural resources. Tribes are the original stewards of the lands and have relied heavily on renewable wild food resources supported by ANCSA (d)(1) lands. Their cultural histories are tied closely to the immediate environments and offer broad perspectives of <i>Indigenous knowledge</i> critical to improving climate change studies and long-term <i>landscape health</i> monitoring. The vast array of <i>Indigenous knowledge</i> perspectives are complementary to western scientific approaches. There is a need of blending both knowledge systems to plan future field studies that monitor <i>landscape health</i>. The blending of both bodies of knowledge, as proposed in the current <i>Public Lands rule-making process</i>, would advance the understanding of climate change effects on many wild food resources, including observations on large terrestrial mammals (caribou, moose, bears and sheep), fur-bearing mammals (martens, wolf, lynx and wolverine), small mammals (hares, squirrels and small rodents), fish (Pacific salmon and the suite of freshwater taxa), migratory waterfowl, song birds and related habitats.</p> <p>Another important source of information are trends in changing river stands, including spring ice jam dynamics and late season high-water flooding resulting from the subarctic rainy season. Alaska Native people rely upon these natural resources for food security, cultural identity, and the delicate relationships between humans and animals. A 2022 White House memorandum on</p>	<p>The Secretary of the Interior has the discretion to select any combination of revocations or retention of 17(d)(1) withdrawals within the range of the analyzed alternatives, including retaining the withdrawals.</p> <p>See response to comment 12994-1 for how Indigenous knowledge is incorporated.</p>	Y

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			<p>traditional <i>Indigenous knowledge</i> referred to the importance of blending traditional ecological knowledge:</p> <p>Indigenous Peoples - and long-standing, place-based communities - manage over 24% of land, which contains ~40% of all ecologically intact landscapes and protected areas left on the planet, and a staggering ~80% of the world's biodiversity. In short, evidence suggests that the most intact ecosystems on the planet rest in the hands of people who have remained close to nature. And Indigenous Knowledge isn't just applicable to land and water use; it is relevant to all human systems. The success of integrating Indigenous knowledge in renewable resource management speaks for itself, and as a juxtaposition, casts long-term values against private, federal, and state management to be more successful at retaining diversity of the natural environment compared to non-Tribal management schemes.</p>		
14414-12	Sarah Obed	Doyon, Limited	<p>Given BLMs allegations of defects in the various NEPA analyses that were completed in support of the respective RMPs and their recommendations to revoke most of the 17(d)(1) withdrawals, BLMs intent to instead base its recommendations upon an EIS that relies on broad assumptions that may or may not prove accurate and that describes highly speculative impacts dependent upon a series of actions before they might occur is questionable.</p>	<p>As described in EIS Section 3.1, Introduction and Methodology, there remain implications that are unknowable on an individual parcel-by-parcel level should the Secretary revoke the 17(d)(1) withdrawals; thus, the analysis uses assumptions to describe the impacts that might occur, should the Secretary revoke the withdrawals and the lands be conveyed or developed. Uncertain variables are disclosed, as are the analysis assumptions that address the uncertainties. The assumptions used are the best available information to allow meaningful analysis.</p> <p>Additionally, the action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually.</p>	N
14563-1	Michael Spindler		<p>I believe BLM should have analyzed, with the same emphasis, all of the lands anticipated to be retained under BLM management that could be opened up to multiple uses, such as locatable, leasable, and salable minerals, and the transportation routes needed to support those uses. Table 1.2-1 states that full revocation could increase acreage open to locatable mineral development from 16,724,000 acres (60% of all lands) to 27,735,000 acres (100%, Alternative D). Perhaps I did not interpret some tables correctly but it seems to me there was not a sufficient analysis of impacts from varying levels of increased locatable mineral developments on D1 lands to be retained in Federal ownership but opened to increased multiple use. For example, in Alternative C you could have analyzed several intermediate levels, such as 70%, 80%, or 90% of these lands to be opened to locatables. Similarly, Table 1.2-1 indicates 26% of the withdrawals currently allow leasable mineral development. For Alternative C you could have analyzed intermediate levels of opening the D1s to mineral leasing, for example, 50%, 75%. Various scientific modeling techniques are available to forecast potential impacts of future development while accounting for uncertainty (Wilson et al. 2013, Fullman et al. 2021).</p>	<p>EIS Section 3.1.1.5, Types of Development that Could Occur on Lands Where Withdrawals are Revoked, discusses impacts to lands that return to BLM management. It is assumed that impacts would be reduced on these lands compared to lands that are conveyed to the State or ANC. Therefore, the analysis under the lands that are conveyed to the State or ANC covers any potential impacts to lands that remain in BLM management.</p> <p>The range of alternatives includes revoking no withdrawals to revoking all the withdrawals. It includes analysis of partial revocation and full revocation. Therefore, a reasonable range of alternatives and potential impacts are described in the EIS.</p>	N
14579-5	Deantha Skibinski	Alaska Miners Association	<p>Without detailed analysis or justification, the DEIS suggests that mineral and other important development projects cannot be done in a manner that protects natural resources and subsistence uses.</p>	<p>See response to comment 14579-12.</p>	N
14579-12	Deantha Skibinski	Alaska Miners Association	<p>Throughout Chapter 3, there are significant biases shown in the assumptions and analysis, including:</p> <ol style="list-style-type: none"> 1) That resource development and subsistence are incompatible land uses. 2) That State land transfers that might occur as the result of d-1 revocations will significantly impact subsistence. 3) That subsistence use is the exclusive primary use of many BLM lands in Alaska, which is inconsistent with their Multiple Use mandate. 	<p>The intent of NEPA is to disclose impacts. Documented impacts on subsistence from the types of development that could occur as a result of revoking withdrawals are disclosed in the EIS.</p> <p>State subsistence regulations are substantially different from Federal subsistence regulations; therefore, subsistence use would be substantially impacted by changes to land ownership.</p> <p>The EIS does not state that subsistence is the exclusive primary use of BLM-managed lands, but that it is an important use that would be impacted and therefore those impacts are disclosed in the EIS.</p>	N
14579-13	Deantha Skibinski	Alaska Miners Association	<p>The number of pages in Chapter 3 devoted to description of the subtopics clearly demonstrates a bias by the authors away from physical earth resources and toward biologic systems and social science.</p> <p>The Chapter 3 Sections on Economics (Section 3.5), Minerals (3.8) and Subsistence (3.14) provide examples of this disproportionate emphasis. Much of the DEIS analysis is based on the amount of Federal land that loses subsistence priority under ANILCA Title 8. Very little is mentioned about the economic and social impacts of retaining these withdrawals and limiting the</p>	<p>Beneficial impacts from mineral development are described in EIS Section 3.5, Economics, and EIS Section 3.12, Social Systems.</p>	N

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			potential for future economic and mineral development on 28 million acres of BLM Multiple Use lands.		
14630-4	Emily Johnson	National Park Service	The impact analysis completed in the document overall is incomplete specifically for resources such as caribou, salmon, water quality and quantity, and subsistence. We believe a more thorough analysis may be warranted and have supplied additional sources and data in the literature submitted for consideration.	All suggested literature has been reviewed and added where applicable and warranted.	Y
14641-20	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS analysis assumes that "lands that would remain under federal management would have more stringent requirements and restrictions and would therefore experience fewer impacts from development than those from development on lands that are conveyed to the State," and that "[l]ands that would be conveyed would be available for development without BLM management protections; other federal protections such as the Clean Water Act (CWA) would still apply." This approach fails to recognize the significant direct, indirect and cumulative effects of hardrock mining, even under federal law and land management policies, and even when federal laws, such as the CWA, apply to projects on State land. The SDEIS for the proposed Ambler Road identified three major Alaska hardrock mines (Pogo, Red Dog, and Kensington) as <i>typical</i> mines for purposes of understanding mine development, closure, and reclamation. All three of these typical mines have been out of compliance with major federal laws to protect air, land, and water over the last 2 years. The Environmental Protection Agency (EPA) compliance database shows the Red Dog Mine out of compliance with the Clean Air Act, the Kensington Mine out of compliance with the CWA, and the Pogo Mine out of compliance with the Resource Conservation Recovery Act over the last 12 quarters. All three of the mines have also resulted in water quality violations from failure to capture and treat wastewater over an extended period of time.	The EIS does not state there would be no impacts on lands that do not remain in Federal management; it states that some Federal protections would still apply because most large development projects in Alaska have a Federal nexus that would require project-specific environmental review, which in turn would require project-specific avoidance, minimization, and mitigation. The EIS cannot assume non-compliance with Federal or State laws during impact analysis because there is no way to predict where or to what extent projects could be out of compliance. Any extensive mineral exploration requires a plan of operations, which would be reviewed for undue and unnecessary degradation, and an associated NEPA analysis would be completed, both of which would require approval by the BLM authorized officer. Each level of exploration activity, either a notice or plan of operations, requires bonding before operations can begin.	N
14641-21	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Although the DEIS states that any development with the potential to impact water quality would be subject to Alaska Department of Environmental Conservation water quality standards and potentially require a wastewater discharge permit (depending on the nature and quantity of discharge, the compliance record of currently operating mines in Alaska demonstrates that compliance cannot be assumed. It is reasonable to anticipate impacts to water and other resources from unpermitted releases. The failure of these three typical mining operations, with three different operators, to comply with federal laws to protect water, air and lands, demonstrates that it is reasonably foreseeable that modern mining operations may result in significant unpermitted impacts to important resources,	The EIS cannot assume non-compliance with Federal or State laws during impact analysis because there is no way to predict where or to what extent projects (as yet unproposed) could be out of compliance.	N
14641-22	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	A recent report also affirms the potential for hazardous spills associated with increased mineral exploration and development based on the spill record of Alaska major hardrock mining operations. This report found more than 8,150 total spills associated with these five mines between 1995-2020, or approximately 300 spills each year. These mining operation spills released more than 2.3 million gallons and 1.9 million pounds of hazardous pollution during that 26-year span. These spills include on-site spills and off-site spills along mining operations haul or access roads. For example, the Red Dog Mine has repeatedly spilled mine concentrate, containing high concentrations of zinc, along its >50 mile haul road. Despite employing a range of mitigation measures, transportation accidents along the haul road at the Red Dog Mine continue to occur, with adverse impacts, including a 2014 spill of 10,000 gallons of zinc concentrate spilled from a truck trailer, a 2015 spill of 18,125 gallons of zinc concentrate from a truck rollover, a 2016 spill of 140,000 pounds of zinc concentrate from a truck accident, and a 2019 truck rollover that spilled approximately 5,300 pounds of zinc concentrate. In response, State regulators have expressed concern about the timeline and difficulty of remediation efforts of these spills on sensitive tundra. The State of Alaska's 2022 annual SPAR report, the most recent available, finds that mining was responsible for 77% of Alaska's oil and hazardous substance spills by volume and 99% of contaminated water spills by volume, primarily due to equipment, line, and valve failure.	See response to comment 14641-21. Additionally, a reference to Lubetkin (2022) was added to EIS Section 3.7.1.2, Fish and Aquatic Species, Environmental Consequences, to acknowledge that spill may occur more frequently than expected. The EIS does not estimate the frequency of spills; that would occur at the project-specific level.	Y
14641-23	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay	significant impacts may also occur from placer mining, and regulatory limitations may preclude adequate protections for important resources. The 2016 Analysis of Management Situation (AMS) for the Central Yukon Resource Management Plan found that current management activities are not preventing impacts to floodplains and wetlands from placer mining because, for example, "notice level mining operations do not follow the minimization, restoration or protection standards because NEPA is not required on this type of activity."	Additional text was added to EIS Section 3.7.1.2.2, Freshwater Aquatic Habitat, Impacts Common to All Action Alternatives, to clarify impacts to aquatic habitat from different types of mining and development.	Y

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	Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The BLM describes the adverse impacts to water quality and fish habitat from mining operations in its 2016 Analysis of Management Situation for the Central Yukon Resource Management Plan: In recent years, water quality meters have been installed above and below mining operations on Gold and Marion Creeks during open water periods when mining operations are active to determine if water quality standards are being met. These meters indicate that these streams (Gold Creek 2012 and Marion Creek 2013) have exceeded State of Alaska Water Quality Standards for turbidity especially during high flow events. In any given watershed, there will likely be discontinuous blocks of disturbed ground within the floodplains of the mined streams for as long as mining occurs. Though there is a known reduction in available fisheries habitat in mined streams, the full extent to which mining activities have impacted fish populations is unknown because pre-mining fisheries data are unavailable for many streams. The AMS found that, "Since the signing of the Utility Corridor Plan Record of Decision (ROD) in 1991, and the Central Yukon ROD in 1986, disturbed watersheds within the planning areas have experienced downward trends in fish habitat condition." This has been due in large part to a steady increase in development. Most of the impact is tied to locatable mineral extraction occurring along the Dalton Highway and at remote sites scattered throughout the planning area.102 It also finds that "[w]ithin the Central Yukon Planning Area water quality is not being maintained in many streams that have been altered by placer mining, and that mitigation to date has been ineffective in regard to non-point source pollution."		
14641-30	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS indicates that "acres of overlap between leasable minerals and State top filed Priority 1 and 2 lands... are likely to be conveyed" and that the greatest impacts "from future development can be expected to occur where an area is both more likely to be conveyed... and more likely to be developed." The State has also indicated it would "prefer[]" for the DOI to proceed with revocation to allow their top filed lands to become effective selections." This preference is presumably based on the State's determination that its Priority 1 and 2 lands have greater development potential. With this in mind, the final EIS should be revised to address the increased likelihood of development should state the State's 1 and 2 priority lands become effective selections.	The EIS analyzes the impacts of State Priority 1 and 2 top filings becoming effective selections in each resource section of EIS Chapter 3, Affected Environment and Environmental Consequences. This assumption is acknowledged in EIS Section 3.1.1, Analysis Methods and Assumptions.	N
14641-46	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	[t]he DEIS assumes that habitat quality and its capacity to support fish is static across space and across time - an assumption that has been widely discarded by aquatic ecologists for over a decade. Because an area has low productivity or abundance at one point in time does not mean that it does not have the potential to support higher abundances in the future. Longer term data on rivers in Bristol Bay showed that local abundances can vary 100-fold over decade-long time scales (the range of natural variability (Davis and Schindler 2021). Properly functioning watersheds should be viewed as portfolios, where the sustainability of the regional resource depends in part on the fact that all populations and habitats do not boom and bust at the same time (ie., low abundance in one area of the watershed are offset by high abundance in other areas the portfolio effect) (Schindler et al. 2010, Brennan et al. 2019). A population that on average is a low contributor to the production of the portfolio can be critical in years when other, more productive populations happen to have low returns. Thus, the loss of or a decrease in productive capacity of a population in the portfolio can disproportionately affect the overall production of the portfolio (Davis and Schindler 2021).	See response to comments 14414-12 and 9995-6.	N
14641-62	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife;	Mineral exploration may result in direct, indirect and cumulative effects on surface and groundwater quality and quantity, adverse impacts to wetlands, riparian areas, springs and seeps, fish and fish habitat. Exploration at the proposed Pebble Mine site included over a thousand drill holes, up to 1,000 meters in depth, and resulted in adverse impacts to water quality. Mineral exploration activities may contribute to permafrost thaw that may mobilize contaminants, including heavy metals, such as mercury, into surface waters from the thawed sediments. In northwestern Alaska, recent observations indicate that waters that drain permafrost landscapes are transporting high concentrations of iron from thawing soils to streams, which are exhibiting higher iron concentrations, less dissolved oxygen, and more acidic water than nearby clear-running streams. A study summarizing the potential impacts of roads, such as exploration roads, determined that they are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems, with the potential to alter animal behavior by causing changes in home ranges, movement, reproductive success, escape response, and physiological state. It found that: Roads of all kinds have seven general effects: mortality from road construction, mortality from	As described in EIS Section 3.1.1.5, Types of Development that Could Occur on Lands Where Withdrawals are Revoked, roads were included in the EIS Chapter 3 analysis. Effects of roads on biological resources are described in EIS Section 3.7, Fish and Aquatic Species; EIS Section 3.17, Water Resources; and EIS Section 3.16, Vegetation, Wetlands, and Special Status Plants.	N

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		Audubon Alaska; Alaska Wilderness League	collision with vehicles, modification of animal behavior, alteration of the physical environment, alteration of the chemical environment, spread of exotics, and increased use of areas by humans. Road construction kills sessile and slow-moving organisms, injures organisms adjacent to a road, and alters physical conditions beneath a road. Vehicle collisions affect the demography of many species, both vertebrates and invertebrates; mitigation measures to reduce roadkill have been only partly successful. Roads change soil density, temperature, soil water content, light levels, dust, surface waters, patterns of runoff, and sedimentation, as well as adding heavy metals (especially lead), salts, organic molecules, ozone, and nutrients to roadside environments. Roads promote the dispersal of exotic species by altering habitats, stressing native species, and providing movement corridors. Roads also promote increased hunting, fishing, passive harassment of animals, and landscape modifications. Not all species and ecosystems are equally affected by roads, but overall the presence of roads is highly correlated with changes in species composition, population sizes, and hydrologic and geomorphic processes that shape aquatic and riparian systems.		
14651-2	Tim Gilbert	Maniilaq Association	The adverse effects of the 17(d)(1) withdrawal on the subsistence needs of each individual tribal government must be reviewed under an ANILCA SS810 analysis to avoid an arbitrary administrative action. Therefore, for effective agency decision making, the DEIS needs to be broken into separate EISs based on the specific original PLOs or RMPs. Otherwise, the only alternative appropriate Alternative A - No Action because this DEIS is too broad and sweeping in its scope.	See response to comment 13927-1.	N
14651-10	Tim Gilbert	Maniilaq Association	DEIS Subsection 3.1.1.1 Land Selection Facts and Assumption of Analysis (See, DESI 3-2 through 3-8) exemplifies the need for BLM to choose Alternative A - No Action. There are 15 "facts and reasonable assumptions" listed in this subsection that, in part or in whole, illustrate how decision-making in this DEIS is based on much speculation and too many assumptions. We suggest retaining the 17(d)(1) withdrawals until ANCSA entitlements and ANVVLAP selections are complete; thereby, eliminating or reducing the instances of speculation and the number of assumptions relied on by BLM for its decision making on the 17(d)(1) withdrawals under this DEIS. We believe reducing speculation and assumptions would assist in reaching a well-founded decision regarding future revocation of the 17(d)(1) withdrawals;	See response to comment 14052-3.	N
14702-10	Catherine Heroy	State of Alaska	The EIS erroneously assumes that the State will only take title to high priority lands. On numerous occasions the State has taken title to lower priority lands, and it is highly likely the State will acquire lower priority lands in the future.	See response to comment 14414-12. The EIS uses the best available information to create assumptions for the analysis. Given that the State has prioritized its selections as required by ANILCA, assuming it would take the land in any other way would not reflect the best available information.	N
14702-22	Catherine Heroy	State of Alaska	Section 3.1.1.1 (Land Selection Facts and Assumptions for Analysis), assumption 3 acknowledges that the State can change the priorities of selected and top-filed lands at any time, but assumes that the March 1, 2023 priorities will be static for 10 years following issuance of the Secretary's Decision regarding the 17(d)(1)s. Section 404 of the Alaska Land Transfer Acceleration Act (ALTAA) (Pub. L. 108-452), codifies that the State can continue to reprioritize its remaining selections until all entitlement is fulfilled. The State has historically reprioritized all remaining selections every ten years, with the most recent reprioritization completed in 2019. However, the State frequently adjusts its priorities based on agency recommendations and projects. Further, with the passage of Alaska Senate Bill 48 in 2023 (Carbon Storage on State Land) and the consideration of similar carbon sequestration initiatives it is likely that State land selection priorities will be modified in the near future.	See response to comment 14414-12. As stated in assumption 3 in EIS Section 3.1.1.1, Land Selection Facts and Assumptions for Analysis, the EIS acknowledges that the State can change its selection priorities at any time. While the State can change its priorities, it is statutorily obligated to provide its priorities to allow the BLM to rely upon those priorities in its management decisions.	N
14702-23	Catherine Heroy	State of Alaska	Section 3.1.1.1 assumption 3 leads to the consideration of scenarios not favorable to the State, but when combined with assumptions 11 and 12, the outcome is more restrictive. Section 3.1.1.1 assumption 11 states: This EIS assumes that the State would take title to all the lands it designated as its Priority 1 and 2 selections. Specifically, the BLM assumes that within 10 years of a proposed Secretarial decision on the project, it would convey all Priority 1 and 2 top filings that become effective selections. Independent of such decision, though considered in the cumulative impacts analysis, the BLM also anticipates that it would convey all currently effective Priority 1 and 2 State-selected lands within 10 years of such a decision. Section 3.1.1.1 assumption 12 states: Further, the BLM assumes that the conveyance of the Priority 1 and 2 selections would fulfill the State's entitlement, and therefore all the selections the State designated as Priority 3 and 4 would either be relinquished by the State or rejected by the BLM, and those lands would no longer be segregated. The combination of these assumptions has the effect of locking in State selections as of March 1, 2023. Since Alternatives B and C define withdrawal revocation boundaries to coincide with Priority 1 and 2 selections, if either alternative is selected the State cannot enjoy its privilege to change selection priorities as is the Congressional intent in the Alaska Statehood Act (Pub. L. 85-508) and ALTAA.	See response to comment 14702-22. Land selection data used for the draft EIS analysis were from March 2023. Land selection data used for the final EIS analysis are from January 2024. As described in EIS Section 3.1, Introduction and Methodology, by law, when lands are no longer encumbered, top filings become effective selections. The BLM used public land records (available in the Public Room at BLM offices or online at https://sdms.ak.blm.gov/sdms/) to determine if State top filings in the decision area occur on lands with additional encumbrances that would prevent those top filings from becoming effective selections. If there are no other encumbrances on the land, if the 17(d)(1) withdrawals were revoked, by law the top filings would become effective selections.	N

Analysis Methods					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14730-5	Kathryn Martin	Ahtna, Inc.	The ANCSA 17(d)(1) Withdrawals Draft Environmental Impact Statement does not specifically identify how these 17(d)(1) lands are to be protected if the 17(d)(1) withdrawals are lifted.	EIS Section 3.1.1.8, Tiering to NEPA Analysis for Resource Management Plans and Other Decisions, states that lands that remain within BLM management would be managed according to the appropriate RMP. EIS Chapter 3, Affected Environment and Environmental Consequences, analyzes impacts to resources should lands be conveyed to the State or ANCs.	N

Minerals					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14006-2	Daniel Cheyette	Bristol Bay Native Corporation	It is BBNC's position that all federal lands in the BBFR should remain closed to locatable mineral entry. The agency's record-combined with robust science describing the impacts of hard-rock mining specifically in Bristol Bay - warrants that BLM maintain locatable mineral entry closures on the 1,063,000 acres of federal land. BBNC cannot support Alternative D for the Bay planning area if that alternative would lead to the lifting of locatable mineral entry closures on the 1,063,000 acres of federal land. Moreover, BBNC cannot support any other action alternative that would otherwise open significant acreage of federal lands to locatable mineral entry in the BBFR. As an initial matter, under any action alternative currently proposed BLM has the discretion to revoke the 17(d)(1) withdrawals while still retaining the current mineral entry closures. BBNC agrees with the agency's interpretation of its own authority that it is within the agency's discretion to target withdrawals and revocations to "only close the land to some public land laws. [...] For example, a withdrawal may be revoked in part only to allow for land selection under the Alaska Statehood Act, but not to allow for any other land laws (such as the Mining Law of 1872)." The agency's own authority and record supports retaining all current locatable mineral entry closures in the BBFR, even if the agency partially lifts some the 17(d)(1) withdrawals in the region. The agency's record itself does not support any demand for the opening of 1,063,000 acres of federal land to locatable mineral entry. In the Bay planning area, with the exception of Goodnews Bay which is located outside the BBFR, there is a notable lack of industry interest in staking locatable mineral claims on federal lands in the region. As the draft EIS notes, despite 180,000 acres of federal lands currently open to mineral entry in the Bay planning area, there are currently no active mineral claims on federal lands within the BBFR, with the most recent federal claims staked abandoned in 2012. However, more importantly, as noted above, the robust science collected over the past decade regarding the impacts of hard rock mining on Bristol Bay's pristine waters provides ample support for maintaining mineral entry closures in the BBFR. Indeed, as other federal agencies have concluded, mining the headwaters of Bristol Bay's pristine river systems would cause harm to the valuable fishery in Bristol Bay.	The EIS evaluates a range of alternatives from retaining all the withdrawals to revoking all the withdrawals. The Secretary of the Interior may choose any combination of revocations of 17(d)(1) withdrawals evaluated within the range of alternatives, including retaining withdrawals in the Bristol Bay area. The effects of potential mineral development, including in the Bay planning area, should withdrawals be revoked are described throughout EIS Chapter 3. Potential impacts of mining on freshwater aquatic habitat and fish are discussed in EIS Section 3.7, Fish and Aquatic Species.	N
14563-11	Michael Spindler		Table ES-1, p. ES-11, under alternative B, locatable minerals, I believe the 14,000,000 should be 14,000.	Calculations were updated in the final EIS to reflect changes since the draft EIS (changes are summarized in EIS Section 2.7, Changes Since the Draft EIS). The number in question has been updated.	Y
14579-14	Deantha Skibinski	Alaska Miners Association	only 20 of 392 pages of text are devoted to minerals - one of the most consequential natural resources to be found in Alaska. The introduction to section 3.8 Minerals states: "The analysis for locatable, leasable, and salable minerals focuses on mineral availability. "Availability" is not what should be evaluated, since it is a projection based on assumptions about access, metal prices, economics, and extractive technology methods. Known mineral occurrences and mineral potential are the appropriate features that BLM should be balancing with other existing resources.	See response to comment 14579-13. EIS Section 3.8, Minerals, evaluates the impacts of the alternatives on minerals, which would be limited to the loss of availability. Discussions about access, market demands, known mineral occurrences, and mineral potential are included in the RFD scenario (EIS Appendix D); RFD Section 2, Leasable Minerals; RFD Section 3, Locatable Minerals; and RFD Section 4, Salable Minerals. These features are considered in describing the area more likely to be developed, which drives the analysis of the EIS.	N
14579-15	Deantha Skibinski	Alaska Miners Association	It does not appear that the USGS, the science agency for the Department of the Interior, provided any minerals analysis for this DEIS. Further, there is little evidence (other than a few citations for water or physiographic data) to any use of the USGS. Within the Department of Interior, USGS is the principal provider of objective scientific data. In Chapter 4, Literature Cited, it says under "Minerals" - "no citations are included in the EIS Mineral section." There are numerous recent USGS publications illustrating statewide mineral resource potential for a wide variety of strategic and critical minerals. The DEIS fails to even cite a single USGS reference for known mineral occurrences, let alone any maps of mineral potential.	As described in the RFD scenario in EIS Appendix D, mineral occurrence locations were taken from the Alaska Resource Data Files (ARDF) database developed by the USGS. The EIS minerals section incorporates the RFD scenario by reference and refers to it frequently. The citations requested in the comment, including USGS data, are provided in the RFD scenario.	N
14625-1	Janet Balice		Mines often do not restore or clean up their mess. The requirement to clean up toxic wastes and return property is not always done. Legal and financial options for requiring this are barriers.	See response to comment 14641-20.	N

Minerals					
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14704-1	Charlie Brown		<p>a lot of these mining development that -- that happens in most places, there's a lot of destruction and contamination that is not cleaned up by the parties responsible for that. It's left up to the people that live in the - in the -- in the region to -- to have to deal with those issues.</p> <p>What -- what will the BLM do to make sure that, you know, there are -- if -- if there is - is mining, that -- that -- development that could come about from this withdrawal, what will the BLM do to enforce that -- you know, the -- the clean-up that's done, and, you know, the -- reduce the - the contaminates and stuff like that? Is there any regulations that -- that BLM has to -- on -- on that land? Any concern there in that regard?</p>	See response to comment 14641-20.	N

General NEPA Compliance/Process					
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10022-2	Theresa Clark	Yukon River Intertribal Watershed Council	<p>I feel like this EIS -- EIS should be broken down into at least five different EISs because you're you're covering 23 million acres of land. Twenty three million. How can an EIS cover that much land and get very specific into it? I -- I imagine there should be -- should be at least 10 volumes to this EIS.</p> <p>And to -- to take public comment on -- on the EIS for five different areas in Alaska, 20 million -- 23 million -- or, 28 million, excuse me I'm, you know, taking out the state state lands. Twenty eight million acres of land. Each -- you know, Alaska's a big state, and you -- it's different. The Aleutian Chain is so different than -- than the -- Kotzebue. There's so many different environmental considerations that are so very different.</p>	See response to comment 13927-1 for a discussion on the choice to complete the EIS for multiple planning areas.	N
10051-1	Anonymous		<p>The introduction to the draft EIS states that the ANCSA 17(d) withdrawals are consistent with area Resource Management Plans. This should not be applied to the East Alaska area because the RMP for East Alaska is outdated. Furthermore, there is not consensus on what the current East Alaska RMP should look like, and although EIS's and drafts have circulated (with thousands of public comments) the process has not come to completion. Furthermore, several East Alaska communities were identified in the BLM's draft EIS as having the greatest potential acres of federal subsistence opportunities compromised by revoking ANCSA 17(d)(1) withdrawals. EIS analysis to revoke withdrawals in the East Alaska region should not be undertaken until a current Resource Management Plan with broad support from Tribal entities and other stakeholders within the region is adopted</p>	The EIS tiers to and expands on the analysis that supported each planning area's ROD/RMP. See EIS Section 1.5, Relationship to Statutes, Regulations, Other NEPA Documents. The East Alaska RMP is the approved RMP for the East Alaska planning area. The East Alaska proposed RMP/final EIS supports the East Alaska ROD/RMP, and it is appropriate for analysis from the East Alaska proposed RMP/Final to be incorporated into this NEPA analysis.	N
13211-8	Caitlin Roesler	US Environmental Protection Agency Region 10	<p>EPA recommends the FEIS include a summary table or narrative of all substantive (i.e., non-editorial) changes made from the DEIS to the FEIS. This summary, in addition to the typical individual response to comment section, will help the public understand what proposed project changes have been made to the document after considering DEIS public comments. Including a summary of changes to the FEIS alleviates the public's burden to review all individual response to comments. EO 14096 Revitalizing Our Nation's Commitment to Environmental Justice for All highlights the importance of meaningful public involvement and ensuring that the public has adequate access to information.</p>	The final EIS includes EIS Section 2.7, Changes Since the Draft EIS.	Y
13731-1	David Geis		<p>Your proposal to open up 26 million acres of D1 lands is way too complicated for me to understand. I would suggest that you wait for a specific project proposal from a specific organization be submitted to you and at that time notify the public for EIS comments concerning that proposal to open up land for that project only.</p>	EIS Section 1.3, Purpose and Need, describes the reasoning behind the need for the EIS. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. Other types of actions would still require environmental analysis under NEPA, and the BLM would have an opportunity to engage the public on specific project proposals at the time those projects were proposed.	N
13997-4	Melissa Shapiro, Brooke Woods	Permafrost Pathways at Woodwell Climate Research Center	<p>The previous administration prepared five Public Land Orders (PLOs) without adequately consulting the federally recognized Tribes who are most impacted by the decisions. The flawed decision to advance the PLOs was also made without any consideration of how lifting the D-1 protections and allowing extractive resource development could negatively affect cultural use areas, fish and wildlife habitat, subsistence resources, hunting, fishing, and gathering rights, and food security for hundreds of communities.</p>	EIS Section 1.8.1, Consultation with Tribes and ANCs, describes the BLM's efforts to engage in government-to-government and ANCSA consultations. A decision by the Secretary to revoke or partially revoke the withdrawals would not affect the ability of the of Tribes and the Department of the Interior to pursue co-stewardship opportunities.	N

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			The US Federal Trust Responsibility owed to Federally Recognized Indian Tribes and Individual Indian Beneficiaries requires the US government to meaningfully consult with Alaska Native communities and to ensure the protection of tribal and individual lands, assets, resources and subsistence rights. The Biden Administration has not only taken steps to ensure that key legal instruments are consistent with this responsibility, but has also pursued strategic protections of Tribal stewardship in the Arctic region. PLOs issued under ANCSA are a critical legal mechanism for implementing these protections and maintaining the 17(d)(1) status of the lands in question is necessary to support national climate change adaptation goals, environmental justice, and principles of Tribal sovereignty.		
14127-1	Allan Chen		The FEIS needs to address the connected action of relinquishing the ANCSA Section 17(d)(1) with all withdrawals made under ANCSA Section 17(d)(2), including Conservation System Units created by ANILCA.	The creation of the conservation system units by ANILCA in 1980 and the now expired withdrawals pursuant to Section 17(d)(2) of ANCSA in 1973 are not connected actions to the consideration of whether to revoke or retain the current ANCSA 17(d)(1) withdrawals.	N
14414-1	Sarah Obed	Doyon, Limited	At the outset, the DEIS remarkably ignores the substantial history over which, in various contexts, BLM has supported lifting the 17(d)(1) withdrawals. BLM determined more than fifteen years ago that the 17(d)(1) withdrawals had outlived their usefulness and could be revoked consistent with the public interest. The recent resource management planning processes for the planning areas covered by the noticed EIS all of which included consultation with Tribes and Alaska Native Corporations (ANCs) and significant opportunity for public participation also concluded that it is time for most of the remaining 17(d)(1) withdrawals to go. Despite BLMs recognition that the agency's land use planning process is the most effective and preferred process for considering the lifting of withdrawals, BLM cast that process aside in order to undertake this current, separate and flawed review. Provided that DOI and BLM are unwilling to cancel the decision to move forward with this revisitation of these decisions in the first instance, as Doyon stated in its scoping comments, BLMs review must give due consideration to the prior reviews and decisions, and the substantial input that ANCs, the State, and others already have provided BLM on this issue. BLM must also provide a reasoned explanation of its reversal of these policies and decisions. BLM has failed to do that.	EIS Section 1.3, Purpose and Need for Action, and EIS Section 1.2, Background, explain the need for the EIS. In accordance with NEPA, the Secretary will provide a reasoned basis for the decision to revoke, revoke in full, or retain the ANCSA 17(d)(1) withdrawals within the decision area.	N
14414-2	Sarah Obed	Doyon, Limited	Reading the DEIS and despite the fact that this was raised by several commenters in the scoping process one would never know that Congress had directed this review, that this reasoned review had ever occurred, or that BLM had generally determined that the 17(d)(1) were outdated and could be revoked. Instead, the DEIS directly contradicts the conclusions in the Section 207 Report, stating that "The purposes of [the 16 PLOs addressed in the DEIS], <i>other than those under ANCSA 17(d)(1)</i> , have been met." DEIS, p. 1-2 (emphasis added). BLM should have included this important context in the DEIS. It also has a responsibility to reconcile its apparent change in position with its earlier one.	See response to comment 14579-7 for a discussion of ALTAA and Section 207.	N
14414-8	Sarah Obed	Doyon, Limited	The DEIS describes various potential impacts associated with the lifting of the 17(d)(1) withdrawals in the analysis area and the resulting expected conveyance of lands out of federal ownership. According to the DEIS, acres where the withdrawals are revoked and the lands are conveyed out of Federal ownership would not have the same protections as acres where the withdrawals continue and the lands would remain under BLM management. It asserts the potential for more development (and various potential associated impacts of such development) on lands in the analysis area where the 17(d)(1) withdrawals are lifted and that are conveyed out of federal ownership. DEIS, p. 3-26 ("Following revocation of the 17(d)(1) withdrawals in part, conveyance of the land to the State of Alaska is likely to lead to an increase in development in areas where State Priority 1 and 2 effective selections are conveyed."); id., p. 3-10 ("Should the Secretary revoke the 17(d)(1) withdrawals, the greatest impacts to the quality of the human environment from future development can be expected to occur where an area is both more likely to be conveyed out of Federal ownership and more likely to be developed (for leasable, locatable, or salable mineral materials).") It also explains that, as a result of top filed land converting to State selections and at least some of those lands then being conveyed to the State, rural residents would lose Federal subsistence priority under Title VIII of ANILCA. According to BLM, under certain of the action alternatives, more than 100 environmental justice communities would be adversely impacted through the loss of Federal subsistence priority, covering approximately 1 million acres. As a result, the DEIS concludes that All action alternatives evaluated in this EIS would result in a disproportionately high and adverse impact to environmental justice populations. DEIS, p. 3-83. The DEIS suggests that, under Alternative A, and to the extent that the withdrawals are retained under certain of the action alternatives, these impacts would be avoided. This is grossly misleading. If the State and potentially ANCs are prevented from obtaining conveyance of all or part of their remaining entitlements from the analysis area as a result of a decision to retain the 17(d)(1) withdrawals, these entitlements will need to be fulfilled from other Federal lands. Thus, while alternatives that would retain all or some of the 17(d)(1) withdrawals might avoid or reduce	Clarification has been added to EIS Section 2.2, Alternative A (No Action Alternative), to disclose that Alternative A would not open any additional lands within the decision area to State of Alaska selection and therefore the State of Alaska would complete its remaining entitlement from their existing effective selections across Alaska. In addition to the clarification in EIS Section 2.2, Alternative A, the BLM has detailed list of assumptions used for analysis in EIS Section 3.1.1.1, Land Selection Facts and Assumptions for Analysis. The BLM collaboratively prepared these assumptions with the State of Alaska. These assumptions are appropriate for evaluating impacts where the BLM reasonably believes State of Alaska top filed lands would convert to selections under the action alternatives, which is a critical to making a reasoned choice among alternatives. The EIS adequately analyzed impacts to all alternatives, including Alternative A.	Y

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			potential changes on certain lands in the analysis area, such changes generally would not be avoided altogether but instead shifted to other areas. BLMs failure to consider and address this issue in the DEIS and to more fully inform stakeholders and the public about the potential implications of any decision to retain the 17(d)(1) withdrawals in the analysis area overstates the potential impacts of the action alternatives relative to the no action alternatives, prevents a meaningful comparison of alternatives, and is inconsistent with its obligations under NEPA.		
14426-2	Scott Chandler		These large-scale, blanket changes in land status are too large to properly scale to what will be impacted and they should not occur. If ANCSA 17(d)(1) withdrawals are to be revoked, they should be on a case by case basis, appropriate to whatever development is being actively planned.	The Secretary of the Interior may choose to implement any combination of the evaluated range of alternatives to each withdrawal. Clarification has been added to EIS Section 2.1, Alternative Development Process, to explain this. The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. The EIS is sufficient to disclose resource impacts to these actions across 28 million acres.	Y
14426-3	Scott Chandler		Firstly, the sheer size of acreage being considered cannot be adequately assessed in one, blanket EIS. The change in land status of so much land begs for the stipulations of the alternatives to not be well followed, as they will exponentially increase the agency's workload to establish, monitor, and manage. This leaves room for mismanagement and violations.	See response to comment 13927-1 for a discussion on the size of the analysis area. and 14641-20 for a discussion on assumptions of compliance.	N
14575-1	Erik Kenning	Arctic Slope Regional Corporation	<p>BLM Has Already Determined that the Withdrawals Are No Longer Necessary and Should be Revoked.</p> <p>In 2004, the Alaska Land Transfer Acceleration Act ("ALTAA"), Pub. L. No. 108-452 (2004), directed the Secretary of the Interior to review the Section 17(d)(1) withdrawals and to submit a report to Congress within 18 months identifying any portion of the lands withdrawn under ANCSA Section 17(d)(1) that could be opened to appropriation under the public land laws consistent with protection of the public interest in those lands. ALTAA, SS 207.</p> <p>In June 2006, BLM completed its report responding to Section 207 of the ALTAA. BLM, Sec. 207 Alaska Land Transfer Acceleration Act: A Review of D-1 Withdrawals (June 2006). As BLM recognized and explained:</p> <p>The ANCSA withdrawals were intended to protect resources, to prevent encumbrances that could interfere with State or Native entitlements, and to study lands for further inclusion into conservation units. In the early 1970s when the lands were withdrawn under Section 17(d)(1) and (d)(2) of the ANCSA, there were few regulations to oversee the development of the public lands and protect important natural resources. Since then Congress has passed significant legislation for the orderly development of the public lands and to protect the environment from adverse impacts. The BLM has 1) developed extensive oil and gas lease stipulations, required operating procedures (ROPs), and surface management regulations for miners, which are now in place and sufficient to assess and protect the resources in most situations, 2) the selection period is over and the BLM is completing conveyance of State and Native entitlements, and 3) more than 102,097,900 acres have been withdrawn by ANILCA and incorporated into CSUs sufficient to protect those lands.</p> <p>...</p> <p>In summary, there are more than 158,958,000 acres of d-1 withdrawals in Alaska. Many of these d-1 withdrawals have outlived their original purpose. It may be appropriate to lift many of d-1 withdrawals and the most effective and preferred means in managing this process is through BLM's land use planning process. . . . This and more stringent requirements for managing development, means the original protections from the d-1 withdrawals are no longer critical for the protection of the public's interest. The d-1 withdrawals are an unnecessary encumbrance on the public land records complicating interpretation of the title records by the public.</p> <p>Id. at 5-6 (emphasis added).</p> <p>As documented in the 2006 report more than 15 years ago, BLM determined that the ANCSA Section 17(d)(1) withdrawals--which were intended to be temporary--had achieved their purpose, outlived their usefulness, and could be revoked consistent with the protection of the public's interest. Consistent with this prior determination, it is time for BLM to revoke the withdrawals in full and implement the public lands laws on these lands. For example, this would allow the State's selection of lands pursuant to the Alaska Statehood Act, and would open lands to mineral leasing, mining claim location and entry, and all other forms of appropriation from which the lands are currently withdrawn.</p>	See response to comment 14579-7 for a discussion of ALTAA and Section 207.	N
14575-2	Erik Kenning	Arctic Slope Regional Corporation	BLM Has Already Evaluated and Recommended the Revocation of the Withdrawals in Prior EISs. BLM has already evaluated and recommended the revocation of the ANCSA Section 17(d)(1)	See response to comment 14414-1 for a discussion on the reasoning to go forth with the EIS.	N

General NEPA Compliance/Process					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>withdrawals in prior National Environmental Policy Act ("NEPA") documents for the five planning areas. When it undertook its resource management planning processes for the five planning areas that are the subject of this DEIS (Bay, Bering Sea-Western Interior, East Alaska, Kobuk-Seward Peninsula, and Ring of Fire), BLM considered the future need for the remaining Section 17(d)(1) withdrawals and, after consideration of public comment, consultation, and other information, developed certain recommendations relating to their disposition. In each approved resource management plan ("RMP") for the five planning areas, BLM recommended the revocation of Section 17(d)(1) withdrawals in each respective planning area:</p> <p>* The 2008 Bay Record of Decision ("ROD") "recommends the Secretary of the Interior revoke all ANCSA 17(d)(1) withdrawals as described in Public Land Orders 5174, 5179, 5180, 5181, 5184, and 5186. The revocation of these withdrawals would open approximately 1.1 million acres for mineral leasing or mineral entry on lands retained by BLM, not on State- or Native-selected lands. State- and Native-selected lands would not be open to mineral leasing or locatable mineral entry until conveyance or relinquishment of selection. Revoking the withdrawals would remove large-scale prohibitions on these activities. However, resource protection measures (Appendix A) have been developed in the RMP to minimize impacts to resources." BLM, Bay ROD and Approved RMP at p. 4 (2008).</p> <p>* The ROD for the Bering Sea - Western Interior Resource Management Plan recommended that "the Secretary of the Interior revoke all ANCSA 17(d)(1) withdrawals." BLM, Bering Sea - Western Interior ROD and Approved RMP at p. II-57 (2021). As the ROD explained, "[r]evocation of ANCSA 17(d)(1) withdrawals will allow top filings by the State of Alaska to become valid selections, thereby segregating those lands. Revocation of ANCSA 17(d)(1) withdrawals would also make lands that are vacant, unappropriated, and unreserved available for qualified veterans under the Dingell Act (Public Law 116-9)." Id. at p. I-11 (emphasis added). This recommendation is reflected in PLO 7902, one of the PLOs now under review and reconsideration by BLM.</p> <p>* The 2007 East Alaska ROD "recommend[ed] revocation of 84% of the existing ANCSA 17(d)(1) withdrawals," after considering a range of alternatives that would have revoked certain withdrawals but maintained others to protect or maintain resource values. BLM, East Alaska RMP ROD and Approved Plan at pp. 6, 11, 26 (2007). Recommendations relating to the Section 17(d)(1) withdrawals were even further considered and addressed in response to protests on the plan.</p> <p>* The 2008 Kobuk-Seward Peninsula RMP recommended revocation of all ANCSA Section 17(d)(1) withdrawals in the planning area after considering a range of alternatives that would have revoked certain withdrawals but either maintained others or replaced them with new ones to protect resource values. BLM, Kobuk-Seward Peninsula ROD at pp. 12, 15 (2008). Recommendations relating to the Section 17(d)(1) withdrawals were even further considered and addressed in response to protests on the plan.</p> <p>* The 2008 Ring of Fire RMP recommended the revocation of the existing ANCSA Section 17(d)(1) withdrawals in the planning area, after considering a range of alternatives to protect or maintain resource values. BLM, Ring of Fire ROD at pp. 6, 12 (2008).</p>		
14575-3	Erik Kenning	Arctic Slope Regional Corporation	During this current NEPA process, BLM must give due consideration to its prior reviews and decisions, and the substantial input that ANCs, the State, and others already have provided BLM on this issue. Instead of continuing to delay resolution of the ANCSA 17(d)(1) withdrawals, consistent with its prior positions, BLM should adopt the DEIS's Alternative D and revoke the ANCSA Section 17(d)(1) withdrawals in the subject planning areas.	See response to comment 14579-8 for a discussion on the reasoning to go forth with the EIS.	N
14579-20	Deantha Skibinski	Alaska Miners Association	<p>Chapter 5 - List of Preparers</p> <p>The BLM provides no information on the qualifications, academic credentials, experience, or suitability of any of these individuals to provide data analysis, nor does it indicate any involvement of the US Geological Survey, other scientific agencies, or academic institutions in the preparation of this document.</p> <p>This list includes abbreviations and acronyms (ABR, DOWL, SWCA, NEI) which are not identified in the list of Abbreviations, and which have no other explanation.</p>	The EPA and State of Alaska were cooperators on the EIS, as described in Section 1.7, Cooperating Agencies. The abbreviations included in the affiliation column of Table 5.1, List of Preparers, are the name of the consultants that helped prepare the EIS.	N
14579-21	Deantha Skibinski	Alaska Miners Association	<p>Appendix A - Figures - Documentation of Sources and Data</p> <p>In Appendix A, figures contain the following note: "No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification." There is no documentation of the derivation of these maps, nor any descriptions or citations of the individual data layers used, or their source. If the BLM GIS is continually updated, this is tantamount to saying "trust us, we found some data somewhere at some unknown time" that is represented here.</p>	Data used to develop the layers for analysis are described in the RFD scenario in EIS Appendix D. A description of the changes to data since the publication of the draft EIS is included in EIS Section 2.7, Changes Since the Draft EIS. Citations to the data used for each resource have been added to the figures in EIS Appendix A.	Y

General NEPA Compliance/Process					
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			Citations are critical to document any scientific product, so that readers can examine original sources and determine if the conclusions derived are supported by the facts.		
14603-3	Tisha Kuhns	Calista Corporation	In the Draft EIS, the BLM cites the statutory purpose of ANCSA 17(d)(1) that "the public interest in these lands is properly protected," and give examples, e.g. protection of subsistence and protection of habitat, cultural resources and threatened species. While these are certainly important public interests that should be protected, the BLM improperly omits the most important public interest contained in ANCSA itself: Setting aside a sufficient acreage of land from other uses to make it available for conveyance to Alaska Native Corporations. The BLM should correct this omission in the Final EIS.	Clarification was added to EIS Section 1.2, Background, regarding the purpose of ANCSA.	Y
14682-1	Saagulik Hensley	NANA Regional Corporation	But here in this region, just to provide some comments on this proposal from NANA's perspective we think that the EIS needs to be broken into separate EISs based on the specific PLOs, or the applicable resource management plans. Otherwise the only alternative to choose really is A, no action, because the EIS is too broad. NANA can't speak to issues from, you know, having to do with other parts of Alaska and whether revoking the withdrawals there, in other regional corporations regions, is a reasonable decision or not. Different areas have different needs for subsistence protections and land management. And also, each region needs to have information presented to it about that particular region with maps and outreach to communities and Inupiaq language translation. It doesn't work to do this in one big full swoop. This state, you know, if you superimpose it over a map of the United States it reaches from like East Coast to West Coast. So this is -- can't be done in one EIS.	See response to comment 13927-1 for a discussion on the choice to complete the EIS for multiple planning areas.	N
14702-2	Catherine Heroy	State of Alaska	the DEIS does not identify a preferred alternative and because this is the last opportunity for public comment on the proposed action, we are concerned that BLM may be depriving the public of an opportunity to review and comment once the Secretary makes a decision.	Agencies are not required to identify a preferred alternative in a draft EIS. As per 40 CFR 1502.14(d), the preferred alternative must be identified in the final EIS. One is identified in the final EIS.	Y
9856-2	President Frank Katchatag	Native Village of Unalakleet	In this rapidly changing environment with so many future unknowns, it is in the public interest to adopt a precautionary approach and prioritize the protection of the natural environment that supports our subsistence resources over the industrial exploitation of intact lands and pristine waters.	See response to comment 11513-1.	N
9995-6	Lisa Wax		The magnoraneous [as spoken], you know, amount of land that we're speaking of just in this, you know East Alaska area, and my closer to home area, there's so much on those lands that -- I don't want to sound egocentric, but things -- things that I feel like I'm the only one that know -- knows about. Particular places where there's trumpeter swans because they're not on the road system. Or, you know, things like that. And so when, you know, Katie was talking about this enormous area, like, how can it all happen so quick, I -- I -- you know, I look at it and I was like, "Well, you guys have no idea what's on that land." Like, you know, so few people go on that land. And -- and you're making this -- you know, this plan according to having no knowledge base of -- or very, very little, you know. And -- and, I mean, I know I've had to point out to BLM two different and I always have a hard time saying this word -- anadromous -- am I saying it right? Anadromous. Thank you. I knew I'd mess it up. But there's, in the -- an earlier BLM topic there was two streams that were marked, you know, as not fish bearing. And -- and I had to show them, you know, that they are fish bearing. And so that's just a tiny example, but it's so huge, you know, because of this downstream effect. I mean, you're saying Klutina, but there's plenty of land of these (d)(1) lands on -- you know, off the Klutina Lake up there, you know. So I think, you know, the downstream effect, and -- and just this lack of knowledge is very disconcerting.	As per 40 CFR 1502.2, an EIS shall not be encyclopedic, and the information is not essential for the Secretary to make a reasoned choice among alternatives. Additional documentation of streams in the decision area would not change the conclusions regarding those resources that (of the action alternatives) Alternative B would have the least impact on streams and that Alternative D would have the most impact on streams. Thus, while updated site information would inform the magnitude of impacts and may be essential at a project level authorization, such information is not essential to a reasoned choice among alternatives at this level or for this decision.	N
14843-1	Senator Dan Sullivan	U.S. Congress	The Department's continued delay in lifting outdated encumbrances on Alaska's land is a blatant disservice to Alaskans—including the Alaska Native Vietnam-era Veterans regarding whom you have broken your commitment to the Alaska congressional delegation by circumventing the opportunity to make millions of acres of land available in the most straightforward, publicly supported, and legally defensible manner.	The Secretary opened 27.8 million acres in the decision area to Native veteran allotment selection in 2022 (PLO 7912). Lands that are not already open to selection as Alaska Native veteran allotments in the decision area are analyzed under Alternatives C and D in the EIS.	N

Paleontological Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14579-19	Deantha Skibinski	Alaska Miners Association	<p>Section 3.9 - Paleontological Resources</p> <p>This section lacks references to any paleontological data or geologic maps, or academic information concerning fossils in Alaska. In previous RMP comments, AMA has raised concerns about BLM's "Potential Fossil Yield" Classification, a system BLM developed for previous RMPs, which no other agency or academic institution uses, and which demonstrates a very limited understanding of invertebrates, microfossils, and the variability of the field of paleontology. The classification system inappropriately uses non-scientific terms as:</p> <ul style="list-style-type: none"> * "highly" fossiliferous (there is no global definition of such and the DEIS does not provide a meaning), * "predictably" produce fossils (fossils within a given geologic unit vary by orders of magnitude within meters) * "significant" fossils - significant to whom? And what for? A dinosaur skull has one significance - a not-visible-to-the-eye radiolarian that can date a completely unknown-age unit has a completely different, but equal "significance". 	<p>The PFYC system is an important management tool used for assessment, mitigation, and management of BLM paleontological resources. The Paleontological Resources Preservation Act of 2009 (PRPA; 16 USC 470aaa-3) and its implementing regulations at 43 CFR 49, along with BLM Manual 8270, guide BLM management of paleontological resources on BLM-managed lands. This includes the PFYC system. Alaska's PFYC was developed by paleontologists at the University of Alaska Museum of the North, based on known occurrences of paleontological resources in the state. The geologic unit rankings given are based on these fossil occurrences and are consistent with other states and follow BLM IM 2016-124. Alaska's PFYC provides important information for this and other management plans in Alaska. As is standard practice with PFYC documents, PFYCs are not formally published. However, they are developed by paleontologists (both internal and external to the BLM) and peer reviewed by BLM paleontologists. Comments on the PFYC are welcome anytime, and the rankings for Alaska may be adjusted as additional data become available.</p>	N

Purpose and Need					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14052-4	Tisha Kuhns	Calista Corporation	<p>In the Draft EIS, the BLM cites the purpose of ANCSA 17(d)(1) that "the public interest in these lands is properly protected," and give examples, e.g. protection of subsistence and protection of habitat, cultural resources and threatened species. While these are certainly important public interests, the BLM improperly omits the most important public interest in ANCSA itself: Setting aside a sufficient acreage of land from other uses to make it available for conveyance to Alaska Native Corporations, pursuant to ANCSA's mandate that "the settlement should be accomplished rapidly, with certainty, in conformity with the real economic and social needs of Natives, ...without creating a reservation system or lengthy wardship or trusteeship...." 43 USC SS 1601(b). The BLM should correct this critical omission in the Final EIS.</p>	<p>Clarification was added to EIS Section 1.2, Background, about the purpose of ANCSA.</p> <p>One purpose for the withdrawals was to ensure the land stays available for ANCSA selections; that has been accomplished. The ANCSA selection period has statutorily expired. The Secretary's decision would not affect existing ANCSA selections.</p> <p>In the rare situation where an ANCSA corporation is underselected, ANCSA 22(j) as amended by Sec. 208 of the Alaska Land Transfer Acceleration Act of December 10, 2004, provides a mechanism for the Secretary to withdraw lands for an underselected Village Corporation to select its remaining entitlement. ANCSA 14(h)(10), as amended by Sec. 206 of the Alaska Land Transfer Acceleration Act of December 10, 2004, provides a mechanism for the Secretary to withdraw lands from which an underselected Regional Corporation can select its remaining entitlement.</p>	Y
14414-4	Sarah Obed	Doyon, Limited	<p>The DEIS's Purpose and Need statement vaguely asserts that "[t]his additional analysis is necessary . . . to correct errors in the previous decision-making process regarding these withdrawals. DEIS, p. 1-6; see id., p. 1-1 (stating that, subsequent to PLOs 7900, 7901, 7902, 7903, and 7899, the DOI identified certain procedural and legal defects in the decision-making process for these PLOs, as described in the April 16, 2021, Federal Register notice (86 FR 20193), including an insufficient analysis under the National Environmental Policy Act (NEPA)". Despite multiple requests from Doyon and others, BLM still has not identified these alleged defects or errors with any level of specificity. It should.</p>	<p>An explanation of the defects in the decision-making process is provided in EIS Section 1.2, Background.</p>	N
14414-6	Sarah Obed	Doyon, Limited	<p>The DEIS's Purpose and Need statement states that the EIS is necessary, among other things, "to ensure that opening these lands is consistent with the purposes of ANCSA 17(d)(1), which requires that 'the public interest in these lands is properly protected,' including factors such as subsistence hunting and fishing, habitat connectivity, protection of cultural resources, and protection of threatened and endangered species." DEIS, pp. 1-5 1-6. Section 17(d)(1) provides that: "During [the 90 days after December 18, 1971] the Secretary shall review the public lands in Alaska and determine whether any portion of these lands should be withdrawn under authority provided for in existing law to insure that the public interest in these lands is properly protected." 43 U.S.C. 1616(d)(1). Congress did not elaborate on or limit the elements that might be relevant to the public interest. Enumerating certain factors that are to be included in the public interest but excluding others could result in the enumerated factors explicitly or implicitly being given greater importance than others. BLM should remove the following from the Purpose and Need statement: "including factors such as subsistence hunting and fishing, habitat connectivity, protection of cultural resources, and protection of threatened and endangered species." Section 17(d)(1) refers to the public interest broadly; BLM shouldn't tip the scales by including a selective list of factors that contribute to the public interest.</p>	<p>Agencies have broad discretion in crafting the purpose and need for NEPA docs. The purpose and need is sufficient for the EIS.</p>	N

Purpose and Need					
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14702-7	Catherine Heroy	State of Alaska	The DEIS acknowledges that the RMPs for all five areas under consideration in this EIS recommended revocation of these withdrawals. ... The previous NEPA reviews connected to these plans involved relevant local, state, and federal agencies, local stakeholders, and the public. The planning processes, subsequent RODs, and recent Determinations of NEPA Adequacy (DNA) conclusions demonstrated the BLM considered the environmental impacts of lifting the withdrawals, including those relevant to subsistence, as applicable to the planning areas. We request the BLM stand by the prior Records of Decision and Protest Resolution Reports for these RMPs, including their recommendations in these planning documents as directed by Congress in ALTAA, and revoke the withdrawals.	See response to comments 14414-1 and 14579-8 regarding the purpose and need for the project. See response to comment 14579-7 regarding ALTAA and the Secretary's decision.	N
14702-8	Catherine Heroy	State of Alaska	More recently, the 2021 Environmental Assessment that approved opening approximately 27 million acres of land to allotment selection under the Alaska Native Allotment Program determined that the same defects this process asserts to address did not pose issues for the same areas.12 If additional analysis had been necessary, it was completed by that EA, or it would not have been possible for BLM to open these same lands to entry and selection by eligible Vietnam era Native Alaskans.	Scope of the action considered in the EA is different than the scope of the action considered in the EIS, in that the EA considered opening that land to a single type of use with only limited impacts.	N
14702-1	Catherine Heroy	State of Alaska	These outdated 17(d)(1) withdrawals have outlived their intended purpose, further evaluation is not needed as adequate analysis of the effects of lifting them has been completed, and continued retention frustrates the State's ability to fulfill its remaining land entitlement.	See response to comment 14702-3 for why this EIS is necessary. See response to comment 14579-7 regarding the decision from this EIS. Alternative A evaluates continued retention. Alternative A would not open any additional lands within the decision area to State of Alaska selection, and therefore the State of Alaska would complete its remaining entitlement from their existing effective selections across Alaska.	N
14843-2	Senator Dan Sullivan	U.S. Congress	As you know, the decision was already made to revoke, in full, the ANCSA 17(d)(1) withdrawals on lands described in PLOs 7899 through 7903 after decades of process under a number of public lands and environmental statutes. As required by the Alaska Land Transfer Acceleration Act (ALTAA), in 2006 the Bureau of Land Management (BLM) recommended in a report to Congress to revoke 56 million acres of PLOs. In that same report, the BLM stated to Congress that the analysis for the revocation of the PLOs under the National Environmental Policy Act (NEPA) would be completed through the resource management plan (RMP) process. Since that time, every RMP has recommended the revocation of PLOs with the accompanying RMP NEPA analysis.	See response to comment 14579-7.	N

Public and Stakeholder Involvement					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10022-3	Theresa Clark	Yukon River Intertribal Watershed Council	And -- and to be taking public comment on ANILCA 810, it's -- I -- I -- and then the historic preservation, this should be 15 different meetings. And it -- it should also be in -- it -- it just -- it's just too much at one time to give public comment.	As described in EIS Section 1.6.2, Public Meetings for the Draft EIS, and in EIS Appendix H, Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement, the BLM held 19 public meetings concurrent with ANILCA 810 hearings for the draft EIS. Comments were accepted online, by mail, by telephone, and through testimony. All comments received during public comment period were considered in the context of both the EIS analysis and the ANILCA 810 analysis. Additional text was added to EIS Section 1.6.2, Public Meetings for the Draft EIS, and EIS Appendix H, Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement, that outlines the public meeting and concurrent 810 hearing process. EIS Section 1.8.3, Compliance with Section 810 of the Alaska National Interest Lands Conservation Act, describes how the project is compliant with ANILCA Section 810.	N
11426-1	–	Alaska Wilderness League	I am writing to express my disappointment with the ANILCA Section 810 hearing that I recently attended regarding BLM's ANCSA 17(d)(1) Withdrawals Draft EIS. I believe the process is disenfranchising residents of rural communities. There were no large maps of the local area/region on the wall illustrating the four alternatives to be studied. No handouts summarizing the potential impacts to subsistence in the region. The legends on the maps in the automated presentation were too small to read, the slides were flipped through too quickly to study the maps, and there was no narrative that explained what we were seeing on the maps -- for example, someone could have said, on this map, color X means Y. It was also disappointing to hear about the lack of printed copies of the various documents in local repositories -- tribal council offices, community or school libraries, etc. The public were supposed to be commenting on the 810 analysis, but I don't even recall a clear point in the presentation that said, and now we will summarize the results of the 810 analysis with specific reference to your local area.	As stated in the public meetings, the ePlanning website hosted an interactive web mapper that allowed for users to view the alternatives and lands that are selected or top filed. The video summarized impacts to subsistence, and the EIS was available for viewing in-person as well as on the ePlanning website. Thumb-drives were available for those without internet access to view the EIS. Hardcopies of the EIS were sent to local repositories.	N

Public and Stakeholder Involvement					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
11426-2	–	Alaska Wilderness League	I don't believe that local rural residents have been provided with adequate access to information to understand and then comment on the implications of the proposed actions for their local areas. People testifying at the hearing mentioned a need for summary tables regarding subsistence impacts for their communities, for example.	See response to comment 11426-1 and 10022-3.	N
13211-4	Caitlin Roesler	US Environmental Protection Agency Region 10	EPA appreciates the information provided in the DEIS on the communication methods utilized to engage in consultation. EPA recommends advertising these engagement opportunities through a wider range of communication channels representing trusted sources of information by the affected communities (e.g., websites, radio, phone calls, flyers, letters) to ensure the broader community is represented in the decision-making process. We also recommend keeping an updated list of preferred communication methods for each entity. The remote and rural nature of Alaska, lack of broadband access, and delays in mail, can create gaps in a group's ability to engage in the federal decision-making process. EO 14096 highlights the need to "provide opportunities for the meaningful engagement of persons and communities with environmental justice concerns who are potentially affected by Federal activities including by providing timely opportunities for members of the public to share information or concerns and participate in decision-making processes, fully considering public input provided as part of decision-making processes, ... and providing notice of and engaging in outreach to communities or groups of people who are potentially affected and who are not regular participants in Federal decision-making."	See response to comment 10022-3. EIS Section 1.6.2, Public Meetings for the Draft EIS, and EIS Appendix H, Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement, detail how the meetings were communicated to the public, which included newspaper ads, local news media, social media, emails, mail, and the project website.	N
13211-5	Caitlin Roesler	US Environmental Protection Agency Region 10	EPA appreciates BLM's tribal engagement efforts, including meetings and direct communication via letters, phone calls, and emails. We recommend the FEIS describe the issues raised during the public and tribal engagement and how those issues were addressed.	Substantive public comments (including those received through Tribal engagement efforts) are included as EIS Appendix H, Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement, as well as the changes made to the EIS in response to those comments.	Y
14414-21	Sarah Obed	Doyon, Limited	The DEIS states that "Between scoping and the publication of the draft EIS, the BLM received letters from Tribes, Tribal organizations, and non-governmental organizations expressing support for retaining the withdrawals to avoid impacts to subsistence resources and impacts to indigenous ancestral homelands." DEIS, pp. ES-4, 1-7. In the interest of transparency, and to avoid the perception of bias, this discussion also should acknowledge that BLM also received letters from Alaska Native entities, including Doyon, expressing support for revoking the withdrawals.	Edit made as suggested.	Y
14665-1	Wilfred Ashby		Each of us have -- in our village constitution and bylaws, and in order to vote, we can say from our villages that they have to be 70 percent to vote for these things. And so right now it's not legal the way things are happening. And they present this for our region as a whole. They need to come to our villages, and it has to be 90 days. They have to give us information before we act on something. This is act of Congress that they -- each of our villages have -- our tribal governments have these things, and that's how -- the only way they can do them if they go through that. If they follow the constitution. We need not to get excited over what's -- that information that they give us, because we have those constitution and they back us up. Each village have to have this information 90 days prior to voting for any kind of stuff to happen like this.	See response to comments 10022-1, 10022-3, and 14100-1.	N
14692-1	Kayla Nay		I've only heard of this today, and I was able to make it to this meeting, so I haven't gone over the ESI [as spoken], but I am also concerned that if it is as what others stated to be too large of a context or too much to read at once, that some of our folks may struggle to fully understanding that. So it would be great to have that broken down into different sections, and to have more community meetings. And to have that full involvement to have meaningful involvement with the community members, because not everyone is aware of what is happening.	See response to comments 10022-2 and 10022-3. Because visiting every potentially impacted community no matter the size would be impractical, in-person meetings were conducted in 14 hub communities to make it easier for people to attend the public meetings. Additionally, five virtual public meetings were held, which also included a telephone line for those who did not have access to the internet.	N
14730-1	Kathryn Martin	Ahtna, Inc.	Merging ANILCA 804 into this ANCSA 17(d)(1) NEPA process is presumptuous that all stakeholders are adequately engaged with their specific needs and concerns identified from a wide range of factors and impacts, both known and unknown.	See response to comments 10022-3 and 14100-1.	N

Public and Stakeholder Involvement					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14760-2	Joe Kameroff		You know, I just got a call and an e mail, "Are you coming to this?" "Yeah. I'll come. I'm curious." But this is a lot of information and not hardly any of us knew about until today. And it came out so fast that lady presenting on your machine over there. So, you know, I hope it kind of slows down, even though it that probably won't happen. But people need to be made aware of it. And I'll echo the one where they said to bring it to the Native language. Sure, a lot of us are speaking English nowadays, but there's a lot of elders and other people they need to hear it in their language before they're comfortable.	The BLM understands that language can be a barrier to receiving and understanding project information. Many different languages are spoken across the 28-million-acre decision area, and it is not practicable for the BLM to translate materials for all languages spoken across potentially affected communities. The BLM did conduct robust outreach to communities and conducted targeted outreach to Tribes. See the summary of public and Tribal outreach in EIS Section 1.6.2, Public Meetings for the Draft EIS, and EIS Section 1.8.3, Compliance with Section 810 of the Alaska National Interest Lands Conservation Act.	N
14762-1	Amanda Hoeldt		I kind of wanted to piggyback off of the accessibility of this information. Given that this pertains to a lot of Alaska Native lands, has any of this information been translated into any of our Alaska Native languages? A lot of our elders still have Yupik as a first language, and a lot of our young people are taught Yupik as a first language as well, along with other Alaskan Native languages... If I'm hearing you correctly, the comment period for this is February 14th, or February 15th 14th and none of this information has been translated into the first language of many of the people that this affects...	See response to comment 14760-2.	N
14762-2	Amanda Hoeldt		I also think that two months, the notice of availability, December 15th to public comment period, and having none of these informations translated to any of our traditional languages, not even Yupik, which is one of the most widely spoken traditional languages, is frankly unacceptable. Our elders still speak Yupik as a first language, and they are our teachers. They are the people who we rely on as things change to see how we should act and how we should continue.	See response to comment 10022-3 and 14760-2. The BLM appreciates the importance of meaningful community engagement and outreach as part of the NEPA process. A summary of outreach and engagement efforts on this draft EIS can be found in EIS Section 1.6.2, Public Meetings for the Draft EIS, and EIS Appendix H, Community Engagement Summary and Comments Received on the Draft Environmental Impact Statement. Though the EIS or associated products are not translated into Yupik, the BLM appreciates this comment and will explore opportunities to bring Indigenous language into future communications and outreach efforts to further bolster engagement.	N
19-1	Marie		When all charges are made all tribal members must have input regarding effect to our substance way of life. This information has to be based in the effects of climate change.time and time again the tribes have asked to be informed with the state and after they have hash it out then the state does what they think is for their own best interest. To avoid this happening everyone must be at the decision making table and made this available to the tribes not after the fact.	See response to comment 14100-1.	N
9891-1	Emily Creek		There are people in my region with such a depth of knowledge of the specific D-1 lands that are also concerned about cultural resources on these lands including but not limited to: old village sites, burials, religious artifacts from pre-contact, implements and tools, stories, and more. I heard a great deal of concern that the people of this region were not aware of this EIS. Specific concern that people in the villages or who have allotments that are surrounded by D-1 lands were not made aware of this process. The broad stroke approach to all D-1 lands in the state versus planning area by planning area resulted in communities most at risk of loss of access are unaware and not having hearings. Statements made by BLM like potential economic benefits of potential development are too vague to be considered substantive for taking action. BLM did not provide detailed regional maps at the meeting and instead instructed folks to access maps, management plans, etc on the internet. Even if internet is working in a village, many people do not have computers to view these things. Mail outs, print outs, etc are all needed, voices from each community are really vital as it is their lives who will be impacted.	See response to comment 14100-1, 10022-3, and 11426-1.	N
9991-1	Angela Wade, Angela Wade	Chickaloon Village	And the fact that this is a public testimony and there are tribal people here is not -- it's divisive. In many communities that's a divisive thing that you're asking us to talk about cultural and our hunting rights, which are different -- rural, non rural, doesn't matter -- it's very different than somebody that's been there for two generations or three, or five. It's very different. And so asking for the meeting, for you to have tribal people as well as public people, doesn't work in my opinion, in our opinion as a tribe. It just doesn't work.	The BLM appreciates your attendance at the public meeting. A public meeting is just one way that Tribes can participate in preparation of an EIS. Tribes may participate through government-to-government consultations, as a cooperating agency, and where applicable, through the Section 106 process of the NHPA. See response to comment 10022-3.	N
9995-1	Lisa Wax		And so I can guarantee you not one of the heli operators, not that I'm a proponent of that, but it is commercial Alaska business, they have no idea this is going on. They have not been reached out to. And for the community of Valdez that's huge bread and butter.	See response to comment 10022-3.	N
9995-3	Lisa Wax		And I -- I just hope that we can perhaps get some more folks involved. It just doesn't seem like anybody knows anything about it. Every single person I've asked in the Valdez vicinity has no idea what I'm talking about. Never heard the word (d)(1). And I think that's the biggest crime of this all, is that it's their land and they have no idea what's going on. And -- and I just -- I hope that we can find a way of bringing this information more to the people.	See response to comment 10022-3.	N

Realty and Lands					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14641-47	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Without including an analysis of the impact of lifting the ANCSA 17(d)(1) withdrawals on lands with wilderness characteristics, the EIS does not fully evaluate the resource conditions on these lands, and BLM cannot make an informed public interest determination as the purpose and need statement sets out. This should be remedied in the final EIS. Additionally, the five RMPs and EISs for the planning areas were inconsistent in whether the BLM analyzed the impacts of the proposed RMPs on lands with wilderness characteristics. For example, the Bering Sea-Western Interior Proposed RMP and Final EIS did evaluate, albeit insufficiently, the impact of the proposed RMP on lands with wilderness characteristics and consider whether management should protect wilderness values. The Kobuk-Seward Peninsula Proposed RMP and Final EIS briefly discussed the wilderness characteristics of nine units within the planning area but then did not analyze the proposed RMPs impact on wilderness values and characteristics. The Bay, Ring of Fire, and East Alaska Proposed RMPs and Final EISs did not describe the lands with wilderness characteristics within these planning areas nor consider the impacts of the proposed management on lands with wilderness characteristics based on a then-existing policy. The existing NEPA analysis for these five planning areas does not, therefore, provide the necessary NEPA analysis of the impacts of lifting any of the ANCSA 17(d)(1) withdrawals on lands with wilderness characteristics.	Lands with wilderness characteristics was added to EIS Table 1.6-2, Issues Identified but Eliminated from Detailed Analysis. No lands with wilderness characteristics overlap with the decision area. There would be no direct effects to these areas.	Y
14681-3	Emily Johnson	National Park Service	From the BLM GIS map online: There is a D1 selection behind the Gulkana Airport next to the Copper River that is part of a larger Federal Highways project to provide public access to the Copper River and NPS lands on the other side of the river. An existing 17(b) easement (EIN23a), managed by NPS, exists near the D1 parcel to provide public access to NPS lands now.	Any land conveyances would be subject to valid existing rights, which include easements.	N
9833-2	Becky Long		The No Action alternative for the lands in the upper Talkeetna River general watershed is important. The D-1 lands need to align with the area's state management plans that the public invested much time and energy to create and pass. * The D-1 lands are north of the Talkeetna Mountain Region of the Susitna-Matanuska Area Plan adopted August 2011 by the Division of Mining, Land and Water, Alaska Department of Natural Resources. Subunit T-01 has designations/classification of Habitat/Wildlife Habitat Land and Water Resources/Water Resources Land. Subunit T-02 is designated Habitat and Recreation Public Dispersed/Public Recreation Land. Subunit L-03 is the state Legislatively Designated area Nelchina Public Use Area.	See response to comment 14702-12 for a discussion of State management plans.	N
9833-3	Becky Long		Susitna Basin Recreation Rivers Management Plan adopted August 1991 and currently under revision is an important state management plan that personifies the important resources of this general area that the public wants to protect. It is also an Alaska Department of Natural Resources managed plan. 44.5 miles of the Talkeetna River including the upper Talkeetna River Canyon is a state legislatively designated Recreation River. The river and its recreation river corridors within which are riparian management areas are managed for high public use values. These are public ownership and use, recreation, fish and wildlife habitat, water quality and water flow. * Retaining D-1 protections are compatible with these plans. The D-1 lands are part of the vibrant long-term economies that result from our undeveloped forests, scenic resources, and our valuable fish and wildlife populations and habitat. The rural and remote residential quality of life has evolved because of these resources. These very resources have made our economies and our lives possible and must be protected. The non-consumptive uses are the backbone of our southcentral economy.	See response to comment 14702-12 for a discussion of State management plans and response to comment 13851-2 for a discussion on the range of alternatives analyzed. Some lands near the upper Talkeetna River are State selected lands and can be conveyed at any time regardless of the decision in the EIS.	N

Recreation and Travel Management					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13600-17	Jen Leahy	Theodore Roosevelt Conservation Partnership	The TRCP is concerned that the assessed current conditions of recreational resources in the draft EIS is limited to the Special Recreation Management Areas (SRMAs) on BLM-managed lands that overlap the D-1 withdrawals. The BLM recognizes that recreational occurs on non-specially designated areas, so we urge the agency to develop a more robust framework to evaluate the potential impacts to recreational users in the final EIS.	As described in EIS Section 3.11, Recreation and Travel Management, the analysis area for recreation was chosen because revocation of the withdrawals across SRMAs, in particular, would represent the most tangible impacts to areas explicitly managed for recreation. The document also acknowledges that recreation generally occurs in all areas of the SRMAs discussed in this section.	N

Recreation and Travel Management					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13600-18	Jen Leahy	Theodore Roosevelt Conservation Partnership	The draft EIS does not adequately capture the value of these 28 million acres of public lands to recreational users, including hunters, anglers, paddlers, hikers, and wildlife photographers. The decision area is vast, wild, and remote, offering residents and visitors alike an unparalleled wilderness experience that is difficult to find elsewhere. Although these qualities can be difficult to quantify, the final EIS should at least qualitatively reflect the profound mental, physical and spiritual benefits that many people derive from spending time in wild places.	Text was added to EIS Section 3.11.1.2.2, Recreation and Travel Management, Impacts Common to All Action Alternatives, to provide more context to the diverse positive benefits of recreation.	Y
13600-19	Jen Leahy	Theodore Roosevelt Conservation Partnership	The final EIS should acknowledge the likely direct and indirect impacts of revoking the D-1 withdrawals on recreational hunters. For example, non-local hunters inside and outside the project area could face additional restrictions on hunting opportunities if habitat fragmentation resulting from revoking the withdrawals contribute to the further decline of caribou herds in the decision area, particularly the Western Arctic Caribou Herd.	Additional text was added to EIS Section 3.15, Terrestrial Mammals, to update caribou herd status and resulting limitations to hunting opportunities. See also response to comment 14641-40.	Y
13657-1	Greg Warren		<p>The DEIS failed to take a hard look at the effects of the roads that would be needed to access the State of Alaska selected lands. CEQ states, The agency is obligated to conduct a meaningful impact analysis in accordance with NEPA, and that analysis should be commensurate with the nature and extent of potential impacts of the decision being made. A programmatic NEPA review should contain sufficient discussion of the relevant issues and opposing viewpoints to enable the decisionmaker to take a hard look at the environmental effects and make a reasoned choice among alternatives. There should be enough detail to enable those who did not have a part in its compilation to understand and meaningfully consider the factors involved.</p> <p>The negative effects from new roads that would be needed to developed D-1 lands would be substantial. An effects analysis resulting from potential road locations and miles would help inform the decision to be made. For example, the DEIS only states, "The Ambler Road would access the Ambler Mining District and facilitate the development of four new major mining operations A new 211-mile industrial access road along the southern flanks of the Brooks Range will extend west from the Dalton Highway to the south bank of the Ambler River and provide surface transportation to the Ambler Mining District." However, the DEIS fails to provide any quantified information regarding the effects from this road. The DEIS should have taken a hard look at all of the access requirements of the Alaska top filed Priority 1 and 2 lands to facilitate an informed decision. For example, the ANCSA 17(d)(1) Withdrawals Draft Environmental Impact Statement should have included an effects analysis for all of the Priority 1 and 2 lands similar to that found in the Supplemental EIS for the Ambler Road see DOI-BLM-AK-F030-2016-0008-EIS.</p>	<p>As described in EIS Section 3.1, Introduction and Methodology, there remain implications that are unknowable on an individual parcel-by-parcel level should the Secretary revoke the 17(d)(1) withdrawals. Unknowable variables include if or to whom lands would be conveyed if the 17(d)(1) withdrawals are revoked.</p> <p>The impacts of exactly where a road would be constructed, for what purpose, and any other specific (as yet unproposed) projects may be enabled by that road would be evaluated at the project-specific level once details on any proposed development are known. The EIS does evaluate the general effects of roads, including the cumulative impact of roads leading to additional development.</p>	N
13929-1	Jonathan Sewall	Iditarod Historic Trail Alliance	Appendix A only depicts the primary route of the INHT in all the mapping. The INHT is a system of trails and connecting trails are a full part of the INHT. While this is described in in the text of the draft EIS, the maps depicting where the draft EIS could affect the INHT is missing more than half of the mileage of this national historic trail. Does the analysis include the entire INHT system? Updated maps are needed to show the entire Iditarod National Historic Trail and how it intersects with the alternatives. It is hard to analyze the difference between the alternatives when the segments potentially effected are not actually included in the mapping.	<p>The EIS has been updated to show that the Iditarod NHT is retained under Alternative B. Thus, calculations for impacts to the corridor were updated. Similarly, calculations for impacts from the other alternatives were updated to reflect impacts to the NHT itself.</p> <p>Additionally, only the primary route of the Iditarod NHT is considered by the BLM to be congressionally-designated and an ANILCA Conservation System Unit, based on BLM policy manual 8353, which identifies NHT-connecting and NHT side trails as Secretarial-designated trails, not congressionally-designated. The comprehensive management plan for the trail, adopted in 1986, identifies the Seward-to-Nome trail as the "Primary Route, and the subsequent BLM Bering Sea-Western Interior RMP recommends withdrawal and establishment of a 1,000-foot-wide ROW (on the primary route centerline on BLM-managed lands within Bering Sea-Western Interior). Most lands transferred to the State under the Alaska Statehood Act contain a reservation that states "Subject to Sec. 7 of the National Trails System Act", meaning subsequent land uses are subject to this Act.</p>	Y
13929-2	Jonathan Sewall	Iditarod Historic Trail Alliance	<p>The IHTA previously provided grants to the State of Alaska to place easements on lands received from BLM that were transferred without an easement or right-of-way for the Iditarod National Historic Trail. Many of these title documents were done after the INHT was designated.</p> <p>The Comprehensive Management Plan (CMP) for the INHT states: Trail Management Guidelines, Section 1.</p> <p>a. National Trail Withdrawal The strongest protection of the Iditarod Trail system on Federal lands is through a formal withdrawal of a specific trail corridor for the specific purpose of preserving the historic values and ensuring continued public travel.</p> <p>Each Department of the Federal Government can withdraw from other forms of land use, such as settlement or mining, a reasonable trail corridor along their respective Trail Segments.</p> <p>b. Administrative Trail Corridor Agencies may also protect the historic resources and ensure public travel along the trail by administratively designating the particular trail route. Protection and management of the historic</p>	See response to comment 13929-1.	Y

Recreation and Travel Management					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>trail corridor can be assured by recognizing the specific trail corridor in land use plans, recreation and cultural resource plans, and other management standards and guidelines.</p> <p>If further protection of the historic resources is needed within the specific corridor, each agency can withdraw the corridor from mineral entry to protect against new mining operations.</p> <p>c. Federal Trail Reservation A trail reservation or right-of-way of specific location and width can be established on Federal land, and will be done in any area where the surrounding land will pass from Federal to State or private ownership.</p> <p>Which of the three alternatives in the CMP for Trail Management Guidelines on federally owned land is BLM proposing in this draft EIS? The IHTA is disappointed that the draft EIS does not state outright that at least a federal right-of-way will be placed on the INHT prior to any of the alternatives being enacted. It has been more than 45 years since the INHT was dedicated by Congress, and BLM is the federal administrator. The Alliance would like the INHT Comprehensive Management Plan followed. While the IHTA would prefer a National Trail Withdrawal, the INHT needs at a minimum a federal right-of-way prior to opening for mineral entry or transfer.</p>		
14375-2	Jamie Dittmar		In addition to their environmental importance, the D1 lands hold significant cultural and recreational value. They provide opportunities for outdoor recreation, including hiking, camping, hunting and wildlife viewing, and are cherished by local communities and visitors alike. Any withdrawal of these lands would deprive the public of these recreational opportunities and diminish our quality of life.	See response to comment 13600-18.	N
14377-2	Kenneth O'Brien		I think it's also important that there be public access preserved for recreation in these areas.	Any valid existing ROWs would be maintained. Once lands are conveyed out of Federal ownership, the BLM would not have the authority to preserve recreational access. EIS Section 3.11, Recreation and Travel Management, analyzes recreation access pursuant to 3373, which requires the BLM to analyze if they maintain access to recreational lands.	N
14681-4	Emily Johnson	National Park Service	<p>Land on Chilkoot Trail Klondike Goldrush National Historical Park (KLGO) provided comments on BLM's Ring of Fire Resource Management Plan (see 2018 KLGO letter to BLM with resource concerns attached). See the below quote on page 1 of that letter. NPS requests that BLM not open lands including the Chilkoot Trail due to conflicts with its current recreation use.</p> <p>"We currently manage the Chilkoot Trail under a Memorandum of Understanding with the State of Alaska's Department of Natural Resources as a recreational experience along a hiking trail lined with in situ Klondike Gold Rush era historic archaeology. Any use of state-selected land along the trail other than hiking would be in conflict with its current recreational use."</p> <p>See Chilkoot Trail Cultural Landscape Report, Zone 1 (PDF page 147 with special attention to Map 10 on PDF page 181).</p>	The lands in the Chilkoot NHT area are valid selections of the State of Alaska and can be conveyed to the State at any time regardless of the decision made in the EIS. The decision to not open these lands fits within the current range of alternatives. Text was added to EIS Section 1.6.1.2, Issues Identified but Eliminated from Detailed Analysis, and EIS Section 3.4.1.2.4, Cultural Resources, Alternative C, to disclose this.	Y
14681-34	Emily Johnson	National Park Service	Glacier Bay National Park just completed our Backcountry and Wilderness Management Plan (2023) https://www.nps.gov/gba/learn/management/upload/GLBA-BWMP-Part-1-Plan-508.pdf . Two factors of the Wilderness Character that the plan strives to protect are: 1) Solitude or Primitive and Unconfined Recreation; and 2) Natural Quality. The NPS's ability to provide Solitude and Natural Quality is compromised by heli-skiing and heli-sightseeing as helicopters outside the park boundary, but also higher than the Takhinsha ridge, disrupt the visual and acoustic experience of wilderness users. The NPS would prefer the lands continue to be managed by the BLM.	As described in EIS Section 3.1, Introduction and Methodology, there remain implications that are unknowable on an individual parcel-by-parcel level should the Secretary revoke the 17(d)(1) withdrawals. Unknowable variables include if or to whom lands would be conveyed if the 17(d)(1) withdrawals are revoked. The impacts of any specific (as yet unproposed) projects would be evaluated at the project-specific level once details on any proposed development are known.	N
14702-12	Catherine Heroy	State of Alaska	Local land use plans are not just for mining and mineral extraction. State area plans also identify lands within the withdrawal areas for recreation and other uses. This is overlooked in the DEIS. The BLM should discuss State land use plans with the State prior to deciding on these withdrawals.	<p>The BLM reviewed Alaska Department of Natural Resources (DNR) plans for the Kenai Area, Northwest Area, Knik River Public Use Area, and Yukon Tanana Area, and reviewed Alaska DNR and Alaska Department of Fish and Game plans for the Susitna Area and Copper River Basin Area. The review of these planning resources is summarized in EIS Section 3.11, Recreation and Travel Management, to provide an overview of State management goals and intentions for recreational resources in those State planning areas. The State of Alaska is also a cooperator on the EIS and has had the opportunity to provide comments and review for how the ADNR plans could be considered in the EIS (EIS Section 1.7, Cooperating Agencies).</p> <p>While the BLM considers the State's management plans, it is not bound by the State's decisions. The decision of how Federal lands should be managed is a fully Federal decision.</p>	N
14832-1	Kristen Kremer		I avid skier and user of Thompson Pass amongst many, many other people. And I am just worried about the lands there, as well as being a fish a fisherperson for the Copper River is my main fishing place, but Bristol Bay all these places that are used for the not only the food, but also the health and the mental status of the people, and just wanting to really protect all of the lands.	See response to comment 13600-18.	N

Reasonably Foreseeable Development					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13600-2	Jen Leahy	Theodore Roosevelt Conservation Partnership	The RFDS in the draft EIS assumes that areas more likely for mineral development are those within 31 miles of existing road, rail, freshwater barge, and ocean port systems. However, the resource development proposals used to inform this calculation exclude current and proposed projects with much longer access roads, such as the DeLong Mountain Transportation System-- a 52-mile haul road that connects the Red Dog Mine to the nearest port--and the proposed Ambler Road, which would stretch 211 miles to connect the proposed mining district and the nearest road system. Clearly, the mining industry is willing to build access roads to projects further than 31 miles from existing infrastructure. We request the BLM adjust the 31-mile limit used in determining impacts in the RFDS to capture the true potential for new development across the D-1 withdrawals in the decision area	As stated in BLM Manual MS-3031, Energy and Mineral Resource Assessment Section 3031.3, mineral potential is not a reliable indicator of mineral development potential. Other factors, such as known mineral occurrences found through mining exploration and accessibility are more reliable indicators of the likelihood an area would be developed for minerals. The 31-mile area used in the EIS to determine the area more likely to be developed for leasable minerals (not locatable minerals, which are the examples provided in the comment) considers accessibility and results in a far larger area more likely to be developed than those estimated in existing RFD scenarios available for some planning areas. For example, the Kobuk-Seward Peninsula RFD scenario produced an estimate of acres of disturbance for locatable mineral development and predicted 1,825 acres of disturbance. The analysis took a more conservative approach to estimate the number of acres more likely to be developed by combining the 31-mile buffer for leasable minerals and the active Federal and State mining claims 1-mile buffer for locatable minerals, to result in a greater number of acres (69,000) more likely to be developed for the Kobuk-Seward Peninsula planning area. Since other planning areas do not have similar predictions of development, this methodology was applied across the entire EIS decision area. The inclusion of the 31-mile buffer of infrastructure for leasable minerals ensured that any areas closed to mineral exploration under the PLOs were included in the analysis. Text was added to the RFD Scenario (EIS Appendix D) Section 3 to clarify this. See response to comment 13628-23 for additional information on how the analysis was developed.	Y
13628-22	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	Appendix D provides details on how BLM determined its Reasonably Foreseeable Development Scenario (RFDS). The RFDS underlies BLMs assumptions of impacts on communities and the environment, making it critical to the conclusions drawn in the DEIS. We have some concerns, however, about the assumptions feeding into the RFDS and whether they are reasonable. For example, the RFDS assumes that areas more likely for mineral development are those within 31 miles of existing road, rail, freshwater barge, and ocean port systems (App. D, p.2). This distance is stated to be the median distance from seven recent resource development projects that would require new access roads. This number seems low, however, both in light of the upper range of the projects described (82 miles for Pebble Mine) as well as other existing infrastructure and proposals. The DeLong Mountain Transportation System road created to access the Red Dog Mine spans approximately 50 miles (Wilson et al. 2016). It was created in the DEIS analysis area in the absence of other nearby access options, showing the willingness of industry to travel farther than the 31 miles assumed in the DEIS. Similarly, BLM has been considering applications for several years for the Ambler Mining Road, designed to access multiple mine sites in the Ambler Mining District which do not currently have other terrestrial or water-based access. The route proposed by the applicant stretches 211 miles. This also is indicative of what industry is willing to construct to access new resources and vastly exceeds the distance assumed by BLM. It is unclear why these roads were not included in the determination of a reasonable access assumption. Given this track record of industry willingness to build longer roads to access new resources, we feel the 31-mile limit used in determining impacts in the RFDS underestimates the true potential for new development across D1 Withdrawals. This needs to be more clearly justified with an explanation of why the observed record of road applications is unreasonable, or a longer distance is needed for the FEIS.	See response to comment 13600-2.	Y
13628-23	Cyndi Wardlow	Alaska Chapter of The Wildlife Society	The RFDS also assumes that the areas most likely to be developed for locatable mineral extraction are those occurring within 1 mile of existing State or Federal mining claims (App. D, p.10). It is unclear how this 1-mile threshold was determined as, unlike for access distances, no explanation was given in the DEIS. Confining areas most likely to be developed to areas within 1 mile of existing claims is also questionable since current D1 lands mostly are not available for mineral leasing, resulting in a lack of active mining claims on those lands (e.g., App. D, Figure 21). This does not imply, however, that there would not be interest in developing those areas if they were made available. Indeed, Figure 22 in Appendix D shows that areas with high potential for locatable minerals cross a number of the D1 Withdrawals in the Kobuk-Seward Peninsula planning area. Assuming areas would need to be within 1 mile of existing claims to have a high likelihood of development seems like an unrealistic limitation that has the effect of diminishing expected impacts of D1 Withdrawal revocation. This assumption needs to be more clearly justified or increased (with justification) in the FEIS.	The 1-mile buffer was used to capture mining operation footprints that are likely to be developed should a mining claim move forward with development. Currently, there are 1,417 active placer claims on BLM-managed lands, and 82 have authorized plans and notices. The footprint of those that have authorized plans and notices is approximately 2.5% of the total mining claim acreage. Therefore, the 1-mile buffer likely overestimates development impacts since all claims were used regardless of if the claims have authorized plans and notices. When combined with the 31-mile buffer used for leasable minerals, the analysis methodology provides an overestimate of disturbance, including in areas that are not currently open to mining claims. See response to comment 13600-2 for additional information on how the analysis was developed. Text was added to RFD Section 3, Locatable Minerals, in EIS Appendix D to clarify methods.	Y
13933-1	Anonymous		All of the topic analyses are formulated using a "focused analysis area", that being the area where it was assumed that development was most likely to occur, depending on factors including the area's proximity to "existing access or infrastructure". Section 3.1.1.2 says that "For all categories of development described in the RFD scenario, the analysis assumes that the	See response to comment 13600-2. EIS Table 3.3-4, Summary of Impacts to Climate, shows the acres more likely to be developed for leasable minerals where 17(d)(1) withdrawals would be revoked under Alternative D, not just where acres are more likely to be developed within the Kobuk-Seward Peninsula planning area.	N

Reasonably Foreseeable Development					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>likelihood of both exploration and development becomes lower with distance from the existing road system, railbelt, freshwater barge routes, and ports due to the cost to construct and maintain access to a potential development site."</p> <p>This presumption is faulty to the extreme. In Alaska right now, road building is being considered or has been considered in the Arctic from the haul road to the Ambler Mining District; in the Susitna drainage; from the West side of the Alaska Peninsula port to the Pebble Mine site; and many other areas. Additionally, roads specifically to utilize mineral deposits in remote areas have already been built, notably the haul road (Dalton Highway) itself and the road from the Red Dog mine to the coast. There, a whole new port was also built to ship ore out. The State of Alaska has a resource extraction mind bent that also includes possible gas pipelines and a new deeper water port in Nome. Your limited development analysis of the withdrawal of these lands from protection is very notably flawed and should be discounted. All of the land in question should be analyzed for possible future development should the lands be withdrawn from protection, and especially those lands that might be conveyed to the State of Alaska. Instead, you conclude in section 3.2.1.2.2, that "Although development outside of the focused analysis area is not reasonably likely to occur, due to the sheer number of acres where the withdrawals would be revoked, there is potential for some type of change to occur, though that potential is low, and it would be too speculative to try to describe the details of such change."</p> <p>I believe that a much broader analysis of the possible effects of development for all the alternatives, for all the categories, should be required. At present, for some categories there seems to be no analysis of the effects of possible withdrawals for whole study areas. Notably, Section 3.6 on Environmental Justice states that</p> <p>"Revocation of 17(d)(1) withdrawals could affect environmental justice populations in two primary ways. First, on lands that lose Federal subsistence priority, hunting competition in certain areas may increase, thus reducing the availability of those resources to local subsistence users. Second, development in the focused analysis area (i.e., priority conveyances that are most likely to be developed) could affect subsistence resources by causing deflection, displacement, changes in resource behavior (including migratory behavior), or through the introduction of contaminants.</p> <p>Impacts would be most likely to occur for communities near or with use areas overlapping with the focused analysis area"</p> <p>This incorrectly limits the analysis of a very important subject, environmental justice, of those few communities that are near or within the "focused analysis area", when it should rightly be analyzed for any lands that are open to possible future development, regardless of their proximity to existing infrastructure.</p> <p>I also note that your "focused analysis area" under section 3.3 CLIMATE show that in the Kobuk-Seward Peninsula area, NO lands are shown to be likely to be developed for leasable minerals where 17 (d)(1) withdrawals would be revoked (table 3.3-4). This seems very unlikely in view of the present Ambler Mining District, and the proposed Ambler Mining District Access Road.</p>	<p>The EIS uses the focused analysis area to focus the analysis on areas that could have significant impacts and warrant detailed analysis. In compliance with 40 CFR 1502.2(b), the EIS has only brief discussion of other than significant issues. EISs "shall discuss impacts in proportion to their significance."</p>	
14127-4	Allan Chen		<p>Alternative C would revoke the ANCSA Section 17(d)(1) on land with high mineral potential. This Alternative is laudable but has two issues. Areas to have high or lower mineral potential are speculative. Land closed to the location and entry under the US Mining Law and Mineral Leasing Law since 1972. First the methods to determine whether an area does or does not have high mineral potential have changed significantly during the intervening 50+ years. Secondly, the economic value of a mineral commodity has changed significantly. And finally, what is or is not a valuable mineral has changed.</p>	<p>The data used to predict mineral location are described in RFD Section 3.1.1, Mineral Occurrences, in EIS Appendix D. The economic value and demand for various minerals are also described in RFD Section 2, Leasable Minerals; RFD Section 3, Locatable Minerals; and RFD Section 4, Salable Minerals.</p>	N
14414-7	Sarah Obed	Doyon, Limited	<p>In discussing the reasonably foreseeable development scenario ("RFD"), the DEIS states that "no stipulations are attached to the lands that would prevent any specific development from taking place." DEIS, p. 3-9; see also, DEIS, pp. ES-8, 3-69 (same). Elsewhere, the DEIS appropriately recognizes that "management prescriptions of existing RMP apply" where the Secretary revokes the ANCSA 17(d)(1) withdrawal. DEIS, p. 3-5. For instance, the DEIS states, "This analysis assumes that where the 17(d)(1) withdrawals are revoked but the land is not selected, the land would be managed according to the appropriate RMP, and the BLM would implement the regional operating procedures and stipulations applicable to each planning area." DEIS, p. 3-13 (emphasis added); see also DEIS, p. 3-82 ("Under Alternative D, all 17(d)(1) withdrawals in the decision area would be revoked; the BLM would manage discretionary actions under the respective RMPs for the planning areas.").</p> <p>Moreover, to the extent permits would be required to authorize any development, BLM would attach stipulations to those permits to mitigate potential impacts. BLMs "assumptions regarding types and levels of development" that is uses to analyze impacts to resources, DEIS, p. 3-9, do not appear to take into consideration the provisions of the relevant RMPs or the terms and conditions that BLM could be expected to impose as conditions of any permitted activity. As a</p>	<p>Clarification has been added to the EIS Section 3.1.1.2, Reasonably Foreseeable Development Scenario, that no terms and conditions are attached to selected lands that would prevent specific development from taking place. And that terms and conditions in existing land use plans would apply to any proposed development on lands that are opened to mineral entry and stay in BLM management.</p> <p>EIS Section 3.1, Introduction and Methodology, (among other sections) states that lands that remain in Federal management would be managed per their appropriate RMP. The analysis for each resource under Alternative D in EIS Chapter 3 includes language describing impacts should lands be revoked and remain in BLM management.</p>	Y

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			result, the DEIS appears to overstate the potential impacts of rescinding the 17(d)(1) withdrawals under the various action alternatives. BLM should clarify its statements relating to the lack of stipulations, reconcile them with its statements relating to RMPs, and ensure that its analysis fully considers relevant RMP provisions and restrictions as well as the terms and conditions that BLM would require as a condition to development. BLM must make clear to stakeholders and the public how the lands in the analysis area would be managed if the 17(d)(1) withdrawals are revoked and how that would differ from how the lands would be managed if they remain in place. The specific provisions of the various RMPs are essential to this comparison, but are nowhere reflected in the DEIS. This is a key reason as Doyon argued in its scoping comments, and consistent with BLMs Section 207 Report why BLM should have left these determinations to the relevant land management planning processes, rather than created this entirely separate process completely divorced from land management decisions.		
14414-11	Sarah Obed	Doyon, Limited	In the DEIS, BLM appropriately recognizes that "The act of revoking 17(d)(1) withdrawals would not cause any direct, specific measurable impacts to resources under Alternatives B, C, or D." DEIS, p. 3-9; see id., pp. ES-8, 3-9, 3-69. Despite this recognition, at various places in the DEIS, BLM refers to "direct impacts" of certain activities. Such references are misleading. In such instances, what BLM is really referring to is the direct effects not of the proposed action or action alternatives, but rather the potential impacts of activities that are indirect effects of the proposed action or action alternatives. See, e.g., DEIS, p. 3-71 ("The direct and indirect economic impacts of oil and gas development would occur over a period of several decades."); DEIS, p. 3-82 (asserting that if the 17(d)(1) withdrawals are revoked and selections therefore become effective, "development could occur . . . and would result in the direct and indirect impacts described in Section 3.6.1.2.2"); DEIS, pp. 3-24, 3-30, 3-40, 3-81 (similar). To maintain the appropriate focus on the actions that are the subject of this environmental review, rather than refer to such potential (and largely speculative) impacts as potential "direct" impacts, the EIS should consistently refer to them as potential "indirect" impacts. Using the term "direct impacts" in the context of referring to the impacts of potential indirect impacts of the proposed action and action alternatives creates confusion and shifts the focus off the actual potential for impacts of the proposed action and action alternatives and the admittedly hypothetical and speculative nature of any potential indirect impacts of that action and alternatives. For clarity, the DEIS should only use the term "direct impacts" in the context of direct resource impacts of the revocation of the 17(d)(1) withdrawals. As the DEIS states, there would be none. Any impacts from induced development would be "indirect" and should be referred to as such.	CEQ guidelines do not require that effects be labeled as direct, indirect, or cumulative. The EIS adequately analyzes the effects of withdrawal revocation to potentially affected resources.	N
14414-13	Sarah Obed	Doyon, Limited	despite lacking information as to the nature and location of such potential development, or as to the terms and conditions under which such potential development might occur, BLM concludes that "[t]his would result in the direct and indirect impacts described in Section 3.6.1.2.2, Impacts Common to All Action Alternatives." DEIS, p. 3-81; see, e.g., id., p. 3-82 (emphasis added) (stating "development could occur . . . and would result in the direct and indirect impacts described in Section 3.6.1.2.2"), p. 3-39 ("This would result in the impacts from future development described in Section 3.3.1.2.2, Impacts Common to All Action Alternatives."). Because whether, the extent to which, and under what terms and conditions development might actually occur on lands where 17(d)(1) withdrawals are revoked and that are conveyed to the State is purely speculative and hypothetical, BLM should generally use the word "could" rather than "would" in characterizing potential impacts.	The purpose of the RFD scenario is to identify and quantify potential development activity in the decision area. It is a projection of potential activity based on best available data at the time of writing to allow the analysis of possible impacts to comply with NEPA. Thus, use of "would" is appropriate.	N
14579-10	Deantha Skibinski	Alaska Miners Association	AMA strongly disagrees with BLM's criteria for determining "high mineral entry". Under Alternative C, BLM would revoke only small areas immediately adjacent to existing claims, which is NOT the same as "high mineral potential". See AMA's comments below on the minerals analysis. Specific examples as to how BLM's definition of "high mineral potential" greatly limits 17(d)(1) withdrawal revocation to allow for mineral entry include: * Bay RMP - Alternative C - Only a half dozen small parcels (possibly areas of existing claims) are revoked, 95% of planning area d-1 withdrawn lands are fully retained. * East Alaska RMP - Alternative C - Only tiny areas East and South of Paxson are lifted, the majority of d-1 withdrawn lands in the planning area are "partially retained". * Bering Sea - Western Interior RMP - Alternative C - The majority of d-1 withdrawals are fully retained, less than 1/3 are revoked. * Ring of Fire RMP - Alternative C - There is very little BLM land in this plan area. Some areas of d-1 withdrawals near Eklutna Lake and the Northern Chugach Mountains are revoked, more than 50% are fully retained. * Kobuk - Seward Peninsula RMP - Alternative C - 3 small areas East of Point Hope are partially revoked. More than 60% of d-1 withdrawals are fully retained. Retained withdrawals include areas South of the Imuruk Basin which will impact Graphite Creek,	The EIS does not use the term "high mineral entry". Mineral potential was used in developing alternatives and mineral development was used to determine the areas more likely to be developed as per BLM Manual 3031.3. EIS Appendix B, Glossary, defines high mineral potential as "Areas where the potential for minerals is high and the certainty of that potential ranges from high to low. Minerals included are rare earth elements, placer gold, platinum group elements, copper, uranium, tin, and hard rock gold." This definition is based on USGS maps and USGS scientific investigations and criteria.	N

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			and in the Darby Mountains, which will impact exploration for rare earth elements, uranium, and other minerals. AMA strongly recommends that the d-1 withdrawals in this area be revoked because of these mineral resources.		
14579-16	Deantha Skibinski	Alaska Miners Association	Reasonably Foreseeable Development scenarios for Mining. "The area more likely to be developed for locatable minerals is the 17(d)(1) withdrawals within 1 mile of existing State or Federal mining claims, as described in the RFD." These "reasonably foreseeable development RFD" scenarios are based on the entirely wrong assumption that an existing claim has any more economically viable mineral potential than any other given parcel of land. To reiterate AMAs comments from previous RMPs: "Many BLM lands subject to these withdrawals have been off limits to staking of mining claims for over 50 years". As a result, the location of existing claims is not an effective evaluation of currently perceived, or true mineral, potential and therefore development likelihood. None of the RFD scenarios even mention or consider the locations of known mineral occurrences, which one could, with reasonable certainty assume to be sites of interest as soon as they were made open to staking. Continued withdrawal of public lands ensures that exploration will never take place and will preclude any effective means of evaluating lands for strategic and critical minerals. In addition, before any major exploration work or development could occur the project would be subject to extensive review under existing federal and state laws and regulations.	See response to comments 13628-23 and 13600-2.	Y
14579-22	Deantha Skibinski	Alaska Miners Association	Appendix D - Reasonably Foreseeable Development Scenario The act of withdrawal revocation itself does not trigger any of the development actions in the scenarios. Any future development of d-1 lands will require extensive Federal and State, and in some areas, borough, approvals. All future development on BLM land, and any significant activity on State land, will require compliance with NEPA. Few mining projects are likely to be developed on lands currently withdrawn from mining under 17(d)(1) withdrawals. Years of exploration are required before any potential deposits are discovered and staked. From the time of discovery to actual development is often more than 20 years, especially if recent projects in Alaska are any indication.	As described in the RFD scenario in EIS Appendix D, the RFD is a baseline projection of reasonably foreseeable activity for a defined area and period that is used for analysis purposes. EIS Section 3.1.1.2, RFD Scenario, states explicitly that no development plans have been submitted. However, for the purposes of analysis, it is reasonable to assume that given the sheer number of acres where the withdrawals would be revoked, there is potential for some development to occur. The timeframe to development is also described in RFD Section 1, Introduction, in EIS Appendix D.	N
14579-23	Deantha Skibinski	Alaska Miners Association	Where the development scenario attempts to quantify "acres of priority conveyances more likely to be developed on 17(d)(1) withdrawals", the acreage figures are often absurdly high. These acreage figures should be deleted. For example, on page 3 of Appendix D, the acreage figure for the Ring of Fire planning area in table 2 is 10,000 acres. This is greater than the total current acreage of land subject to oil and gas development in the planning area, and likely, most developable oil and gas land is already owned by ANCSA Corporations or the State. Currently leased acreage may be greater, but surface development is much smaller. Similarly, table 2-2 on page 4 of Appendix 4 shows 43,000 acres "to be developed" for oil and gas, in an area where, to our knowledge, there are NO lands currently developed for oil and gas.	The RFD scenario is a baseline projection of reasonably foreseeable activity for a defined area and period that is used for analysis purposes; an RFD scenario is not a plan of development nor a guarantee of development. The RFD uses the best available information to predict where development is more likely to occur relative to other areas, not where development will occur. The RFD and EIS do not suggest that it anticipates all of these areas to be developed.	N
14579-24	Deantha Skibinski	Alaska Miners Association	Section 5 of Appendix 4 should either be deleted, or it needs to be stated that 17(d)(1) withdrawals DO NOT prevent BLM from issuing a ROW on BLM lands.	Lands managed by the BLM are available for contracts and to grant leases, permits, ROWs, or easements. RFD Section 5, Rights-of-Way, states that ROWs on effective selections cannot be approved without State concurrence or ANC coordination prior to approval on withdrawals.	N
14641-25	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS addresses two categories of impacts likely to reduce abundance, availability, or access to subsistence resources: impacts due to the loss of the federal subsistence priority for rural residents and impacts resulting from mining and mineral leasing, exploration, and development. ... However, because of the limitations of BLM's RFD scenario, the number of communities potential impacted is likely higher. BLM's RFD scenario employs numerous parameters that underestimate impacts from exploration and development. The RFD scenario assumes "[f]or all categories of development 19 . . . that the likelihood of both exploration and development becomes lower with distance from the existing road system, rail belt, freshwater barge routes, and ports due to the cost to construct and maintain access to a potential development site." Areas with a high likelihood of leasable mineral occurrence, such as oil gas and coal, are considered "more likely to be developed" if they are within 31 miles of existing access routes." For locatable minerals such as gold and platinum, only lands with "high mineral potential" meaning "the potential for minerals is high and the certainty of that potential is high," are considered more likely to be developed if they are "within 1 mile of existing State or Federal mining claims." These parameters are overly narrow and do not reflect the reality of mining and mineral leasing in Alaska. As BLM recognizes, projects such as the Donlin Gold Mine and mining in the Ambler Mining District involve new "infrastructure crossing large portions of the state." The proposed Ambler Road, which would support mining in the Ambler Mining District, would be over 200 miles long. The proposed West Susitna Access Road, which would provide access to gold mining claims	As described in response to comments 13600-2 and 13628-23, the existing methodology likely overestimates the area more likely to be developed. Additionally, the more likely to be developed areas were used only for calculation of impacts from development. It was not used to determine areas that would lose Federal subsistence priority.	Y

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			in the Estelle Mining District, would be 100-miles long. These projects make clear that areas with a high likelihood of mining potential may be pursued by industry regardless of their proximity to existing access routes. With this reality in mind, BLM should expand its RFD scenario parameters to fully account for subsistence impacts. For example, the DEIS indicates the Ring of Fire Planning Area contains 6,434,000 acres of land with high oil and gas potential but only 10,000 of those acres are deemed "more likely to be developed." Similarly, the Ring of Fire Planning Area contains 22,245,000 acres of "high locatable mineral potential" but only 2,000 acres are considered more likely to be developed. In the final EIS, BLM should expand the lands considered more likely to be developed, and those communities likely to experience subsistence impacts, in light of industry's demonstrable interest in remote development far from any existing access routes.		
14641-61	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS analysis defined the <i>area more likely to be developed</i> for locatable minerals as those lands with existing State and federal mining claims and operations, including a 1-mile buffer surrounding the claims. This is inadequate because it assumes that no additional State or federal claim-staking and associated mineral exploration and/or extraction would occur on any of these lands over the 30-year timeline outlined in the DEIS if the ANCSA 17(d)(1) withdrawals are lifted. The DEIS appears to base its narrow focus on the length of time it takes from claim-staking to mineral extraction (i.e., a mine permit). This approach fails to account for the much shorter timeline associated with the impacts of mineral exploration, which may occur within months or a few years after claim-staking, and may result in significant direct, indirect and cumulative impacts. Exploration activities meet the BLM's definition of development, which the DEIS defines as "changes to the land due to the installation of infrastructure or associated activities listed above," which "include construction or expansion of infrastructure that may include roads, trails, pipelines, buildings or structures, increased traffic, off-highway vehicle (OHV) use, increased human noise and activity, the potential for air and dust emissions, and water withdrawals or wastewater discharge." As demonstrated by the exploration activities in the Ambler District, exploration often includes road construction, drilling, worker camps, air strips, water use, building construction, and other development activities. Additional claim-staking and exploration activities may result in significant social and environmental impacts and must factor into the reasonably foreseeable development scenario and the <i>area more likely to be developed</i> .	Regardless of the Secretary's decision from the EIS, mining claims can be filed and exploration of that claim can take place. For a description of how claimants can file and explore for minerals, and steps taken to reduce mining exploration impacts, see RFD Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, and 3.5.3, in EIS Appendix D. Staking a mining claim imparts negligible impacts on the land (merely posting claim corners). Minor mineral exploration activities require submittal of a notice, which must show how such activities would cause no undue or unnecessary degradation. Any extensive mineral exploration requires a plan of operations, which would be reviewed for undue and unnecessary degradation, and an associated NEPA analysis would be completed, both of which would require approval by the BLM authorized officer. Each level of exploration activity, either a notice or plan of operations, requires bonding before operations can begin.	N
14641-63	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	ANCSA 17(d)(1) lands that have been closed to mineral entry and have high mineral potential are particularly vulnerable to new claim-staking and exploration activities if the withdrawals are lifted new claim-staking and mineral exploration are likely to occur on ANCSA 17(d)(1) lands that have been closed to mineral entry, have high mineral potential, and are identified as priority conveyances. Once the lands are conveyed, it is reasonable that the State would open these areas to mining activity within the 30-year timeline outlined in the DEIS.	The Reasonably Foreseeable Development scenario addresses this scenario, and the EIS does assume the land conveyed to the State would be opened to mining activity.	N
14641-64	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	It is also reasonably foreseeable for federal claims to be filed on ANCSA 17(d)(1) lands that are currently closed to mineral entry, in places where State claims have been top filed, but the lands are not a priority conveyance. For example, the map excerpt from Figure 9 identifies active State mining claims in the Bay Area in orange, which overlap with ANCSA 17(d)(1) lands that have been closed to mineral entry but are not priority conveyances. If the withdrawal is lifted, it is reasonable to assume that the claimholder would stake federal claims on these lands to replace their State claims.	Though new claims may be staked in areas that become newly opened to mineral entry if 17(d)(1) withdrawals are revoked, few claims would be developed. Though there are 6,700 Federal mining claims, approximately 100 of those are active mining operations. (Some operations can span across several claims; and some operations might cover only a few acres within a single claim.) Thus, the RFD considers areas near to existing mining claims to be more likely to be developed for the purposes of the EIS analysis (see RFD Section 1, Introduction). Additional text was added to the RFD Section 3, Locatable Minerals, to clarify this. It would be speculative to assume a claimholder would stake Federal claims to replace State claims, especially if an operator only intended to develop those claims if they were eventually conveyed to the State. The operator may not have interest in developing the claims if the lands were to remain in Federal jurisdiction.	Y

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14641-65	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS states that mining activity on BLM-managed lands has been declining for over 20 years, and most of the activity has been exploratory. This statement cites a 2006 document, which is simply too dated to provide a current assessment.	As stated in RFD Section 3.2.3, Mining Claims, the number of active mining claims shown in RFD Table 3-3, Mining Claims within the ANCSA 17(d)(1) Withdrawals within the Ring of Fire Planning Area, was assessed in June 2023. The June 2023 data support the BLM (2006a) reference that mining activity on BLM-managed lands in this planning area has been declining for over 20 years.	N
14641-66	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS should provide more clarity on how it determined the areas more likely to be developed. For example, it isn't clear why the <i>area more likely to be developed</i> (in red) was selected in Figure 9 for the Bay Area (above map excerpt). From the DEIS description, the area more likely to be developed includes all State and federal mining claims and a 1-mile buffer surrounding those claims, yet the map identifies a small area (in red) as the area more likely to be developed, rather than the active mining claims, plus 1-mile buffer. Similarly, Figure 15 from the Bering Sea-Western Interior Area identifies active State mining claims (in orange), including those that overlap with ANCSA 17(d)(1) lands, yet the area more likely to be developed (in red) is a small subset of this area.	How the area more likely to be developed was determined is described in RFD Section 3, Locatable Minerals, in EIS Appendix D. In addition to mining claims, where mineral potential was identified is included in the determination of areas more likely to be developed. In the case of Figure 9 from EIS Appendix D, the areas in orange (active State mining claims) that fall within ANCSA 17(d)(1) withdrawals are State selected Priority 1 and 2 lands, which were removed from the area more likely to be developed layer because they are considered in the cumulative effects analysis for each resource.	N
14641-67	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS fails to include a rationale for selecting a 1-mile buffer around existing State and federal mining claims to determine <i>the area more likely to be developed</i> . This approach may substantially underestimate the potential impacts from a typical mining operation and associated infrastructure. For example, the roads, pipelines, powerlines, power plants, worker camps, helipads, airstrips, and other infrastructure associated with the proposed Pebble Mine, Ambler, and Donlin Projects, and the existing infrastructure for the Red Dog, Pogo, and other operating mines extends far beyond a one-mile buffer. This type of infrastructure has significant direct, indirect and cumulative effects, which must be considered. Mining operations often expand over time and/or increase the potential for satellite operations, which benefit from the existing infrastructure (e.g., the Fort Knox and True North Mines). Furthermore, a 1-mile buffer surrounding existing mining claims fails to consider the adverse effects, such as noise, dust, contaminants that extend beyond the mine footprint. The noise analysis for the Red Dog Mine identified a noise disturbance boundary of 6.6 miles around the mine site and 2.3 miles on either side of the access road, and another recent study found moderate to strong impacts on lichens from fugitive dust at the Red Dog mine haul road, equivalent to almost 1 km on both sides of the haul road running 32 km through Cape Krusenstern National Monument.	See response to comment 13600-2 and 13628-23.	Y
14641-68	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS specifies a 31-mile distance, based on the median distance of seven recent resource development projects that would require new access roads (range of distance was 82 miles for Pebble Mine and 28 miles for Graphite One Mine). The DEIS does not identify all seven projects it used to calculate the median distance, or the rationale for selecting those seven projects, or why the median value is appropriate for this determination. This information is necessary for the public to understand the assumptions used as the basis for the 31-mile distance analysis in the DEIS, and to provide meaningful comment. It is also inadequate because it fails to include other reasonably foreseeable distances. The existing Red Dog haul road is 52 miles in length, demonstrating that access roads over 50 miles are reasonably foreseeable because one already exists in Alaska. The proposed Ambler Road is a 211-mile haul road proposed by AIDEA to access mineral deposits in the Ambler District, which is reasonably foreseeable, given the BLM's prior approval of the proposed project. The West Susitna Access Project is a proposed 100-mile industrial road, proposed by AIDEA, to access mineral and energy resources.	See response to comment 13600-2.	Y
14641-69	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman,	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center	Extensive exploration activity may also occur in areas that are supported by air or by ice roads. For example, the Pebble Mine exploration site, which is not connected to a road system, included over a thousand drill holes, up to 1000 meters in depth, and resulted in impacts to water quality.	See response to comment 14641-61.	N

Reasonably Foreseeable Development					
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	Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	Similarly, exploration at the Ambler and Bornite deposits (supported by air) include exploration roads, drill pads, worker camps, etc. (see photos above). There are four gravel airstrips located near the Arctic Project, 64 km west at Ambler, 46 km southwest at Shungnak, 37 km southwest at Kobuk, and 34 km southwest at Dahl Creek. A winter trail and a one-lane dirt track suitable for high-clearance vehicles or construction equipment links the Arctic Projects main camp located at Bornite to the Dahl Creek airstrip southwest of the Arctic deposit, and an unimproved gravel track connects the Arctic airstrip with the Arctic deposit.		
14641-70	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The use of the 31-mile distance is inadequate, and therefore, underestimates the <i>area more likely to be developed</i> . The DEIS also specifies the 31-mile distance for leasable minerals using the distance for proposed locatable mineral projects. For similar reasons, the 31-mile distance is not supported as a reasonable limit for leasable mineral development. The DEIS should include maps that identify the areas that are excluded and/or included as a result of distance in order for the public to be able to provide meaningful comment.	See response to comment 13600-2. A figure (Figure 28) was added to the RFD scenario (Section 2, Leasable Minerals) in EIS Appendix D to show the 31-mile area.	Y
14641-71	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	According to the DEIS, reasonably foreseeable is assumed to be within 30 years from publication of the record of decision (ROD). ... As described in a recent Government Accountability Office report, "[t]he General Mining Act of 1872 (1872 Mining Law) grants individuals a statutory right to explore, develop, and mine on public domain lands open to mineral entry. A mining claim gives a claim holder the exclusive right to conduct mining activities and activities reasonably incident to mining. Rights conveyed through a mining claim <i>can exist in perpetuity</i> as long as the claim holder pays an annual maintenance fee or files a maintenance fee waiver each year." The 30-year timeline appears to focus on the timeline to mineral development (mine permitting), but fails to account for the time and impacts associated with ongoing operations (and expansions), closure and post-closure. The Red Dog and Greens Creek Mines have been in operation since 1989, and both mines have plans to operate until 2031 a 40-year timeline. The Red Dog Mine is also projected to generate acid mine drainage in perpetuity, which will require water treatment facilities and management in perpetuity. Water quality impacts, requiring treatment into post-closure, are also anticipated at the Greens Creek Mine. The DEIS should specifically recognize that the temporal scale of RFD may continue in perpetuity and result in a potential permanent commitment of resources.	Existing mine expansion, closure, and post-closure are described in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area. As described in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions, the BLM considers reasonably foreseeable trends and planned actions when they would affect resources of concern within the geographic scope and the timeframe of the analysis (40 CFR 1502.15). Reasonably foreseeable trends and planned actions are considered in the affected environment and cumulative impacts analysis for each resource. The timeframe described in the RFD scenario in EIS Appendix D is what is reasonably foreseeable in terms of new developments in the decision area. The timeline considered for impacts analysis is different and is described in EIS Section 3.1.1.7, Temporal Scale of Impacts. Extending the RFD timeline beyond 30 years would be speculative and not reasonably foreseeable.	N
14641-72	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The DEIS identifies acres of authorized and pending Rights of Way in the planning areas in Tables 5-1 and 5-2, yet there are no maps in the DEIS that specify the name and location of these development projects. Without that information, it is difficult for the public to review and provide meaningful comment. For example, the DEIS states that although the Pebble Mine deposit does not directly intersect ANCSA 17(d)(1) withdrawals, the proposed road to the mining area potentially goes through ANCSA 17(d)(1) withdrawals. Yet, Table 5-2 does not identify any acres of roads or associated pipelines as pending Right of Ways in the Bay Area.	All the PLOs for the 17(d)(1) withdrawals in the decision area allow for ROWs, thus revoking a withdrawal would not affect the BLM's ability to issue ROWs. The information available is not specific or accurate enough to include in figures for review.	N
14641-73	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay	The DEIS identifies 23,000 acres of lands with a high potential for coal on ANCSA 17(d)(1) withdrawals in the Copper River and Jarvis Creek coal fields in the East Alaska Planning Area. It finds that the lands with a high potential are accessible from or are near existing infrastructure. However, it concludes that currently, 100 percent of demand for coal in Alaska is being met by the existing Usibelli Coal Mine in Healy, and it is deemed highly unlikely that any new coal mines in Alaska could profitably compete with this existing supplier. Therefore, the DEIS concludes that no	Text was added to RFD Section 2.4.4, East Alaska Planning Area, in EIS Appendix D to provide references regarding coal demand and production.	Y

Reasonably Foreseeable Development					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
	Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	areas are likely to be developed for coal in the ANCSA 17(d)(1) withdrawals of the East Alaska planning area. The DEIS fails to provide supporting information to demonstrate that these areas could not compete, nor does it indicate that the Usibelli Coal Mine could supply the states demand for coal for the next 30 years.		
14641-74	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	the DEIS states that [t]here are 557,000 acres of lands with high coal potential in the Bering Sea-Western Interior planning area, 432,000 acres of which are on ANCSA 17(d)(1) withdrawals. There is no coal potential within priority conveyances in the Bering Sea-Western Interior planning area. Coal resources in the planning area are concentrated in the Lower Koyukuk and Minchumina Basins. The development potential for these resources is low due to the low grade of the coal, the high initial cost of production, and a lack of local infrastructure for storage and distribution. Therefore, no areas are likely to be developed for coal in the ANCSA 17(d)(1) withdrawals of the Bering Sea-Western Interior planning area. Yet, the DEIS fails to provide supporting information for the grade and production costs.	An in-text citation was added to the RFD scenario in EIS Appendix D to provide supporting information for the grade and production costs of coal in the Bering Sea-Western Interior planning area.	Y
14641-75	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The BLM uses the <i>area more likely to be developed</i> and the overlap with the priority conveyance areas to form the <i>focused analysis area</i> for the resources analyzed in Chapter 3.78 The DEIS uses a focused analysis area to highlight where effects are most likely to occur within the 28 million acres analyzed. It concludes that the <i>focused analysis area</i> comprises 475,000 acres or 2 percent of the planning area. As noted above, the <i>area more likely to be developed</i> is underestimated, and therefore the <i>focused analysis area</i> for resource analysis is underestimated as well.	See response to comments 13600-2 and 13628-23.	Y
14681-32	Emily Johnson	National Park Service	The development of a mine for locatable minerals is a possible future activity that will likely lead to more roads, more hunting pressure, and more deaths by vehicle collisions. The Palmer mining project is "reasonably foreseeable" and while those claims are not in this block of land, it is only a few miles away. These comments address similar topics to NPS comments on the Haines Amendment 7-31-2019 (attached).	The Palmer Project was clarified in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area. The project is included in the analysis of impacts for each resource in EIS Chapter 3, Affected Environment and Environmental Consequences, including impacts to wildlife (EIS Section 3.15, Terrestrial Mammals) and impacts to subsistence and hunting (EIS Section 3.14, Subsistence).	N
14842-2	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	The Service is concerned the DEIS does not fully analyze factors when developing the RFD analysis. The DEIS states "For all categories of development described in the RFD scenario, the analysis assumes that the likelihood of both exploration and development becomes lower with distance from the existing road system, railbelt, freshwater barge routes, and ports due to the cost to construct and maintain access to a potential development site." The "Ambler road" is an example of an expensive long, linear project proposing to connect development to the current road system. The proposed Ambler Road development (a 211-mile access road through pristine habitats with a proposed 50-year life) is currently being assessed by the BLM and increases the likelihood of development along the entire route. The BLM states "According to [Alaska Industrial Development and Export Authority] AIDEA, the access corridor is needed to increase job opportunities and encourage the economic growth of the State. Without access, AIDEA has concluded that the mineral assets associated with the District would remain unused, and AIDEA would not be able to support economic development and increase job opportunities within a region known for high unemployment rates." The Service suggests the likelihood of support facility and structure development has been minimized by distance from current access routes, thereby underestimating the RFD impacts for the Action. Therefore, we recommend additional non-spatial factors, like those influencing the Ambler Road (e.g., resources development, economic growth, and access to mining resources), be included when assessing RFD and results mapped for review.	See response to comment 13600-2 regarding the BLM's approach to determining the area more likely to be developed for leasable minerals. See response to comment 13628-23 regarding assertions that the RFD may result in an underestimation of impacts. The EIS takes a programmatic approach to the analysis by describing mining actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of those mining actions individually. It is not necessary to provide detail beyond what is disclosed in the RDF to make a reasoned choice between alternatives. The 211-mile private road proposed in the Ambler Road Project is an outlier in terms of access to mining resources.	Y

Scope					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14730-6	Kathryn Martin	Ahtna, Inc.	We believe this can be accomplished through a systematic approach versus a blanket approach identified in the Draft Environmental Impact Statement. This approach would be similar to other Public Land Orders issued previously across each respective planning area.	See response to comment 13927-1 for a discussion on the choice to complete the EIS for multiple planning areas.	N

Land Selection					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10116-7	–	Alaska Wilderness League	E. In terms of Climate change, there is a current and will be future needs for local villages needing to be relocated. Lands previously selected as Native Allotments and Village selections are becoming submerged or unusable. Shouldn't the unconveyed 17(d)(1) lands be made available for providing new village sites and allotments that have become unusable due to erosion and climate change? Retaining these lands in federal management, as an option to address current and future climate change needs, can keep these communities out of harms way. Areas traditionally used for subsistence and access to these areas is changing with climate change. This information and projections should be included in this analysis BEFORE the lands conveyances are considered to the State.	Text was added to EIS Section 3.3.1.2.2, Climate Change, Impacts Common to All Action Alternatives, to disclose that any revocation of 17(d)(1) withdrawals would remove flexibility for the Federal government to retain lands that could be available for village relocation due to climate change or used in a land exchange for that purpose.	Y
13549-1	Mary Odden, James Odden		Transferring more than a minimum of lands to the state--those under Alternative B, or any broad or indiscriminate opening to extractive uses of the lands, will affect not only the state lands conveyed but the quality of experiences on the federal land that remains.	The indirect effects of revoking 17(d)(1) withdrawals on adjacent parcels was considered throughout the EIS analysis. Resources with notable impacts considered on adjacent lands include (but are not limited to) BLM special designations (EIS Section 3.10.2), Recreation Management and public access (EIS Section 3.11.1), and 14(h)(1) lands (EIS Section 3.4.2).	N
14378-6	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	We know that the state of Alaska has over-selected lands for conveyance across Alaska, and we do not believe that D1 withdrawals should be lifted until the state of Alaska is forced to complete selection of lands across the entire state, in conference with each individual, sovereign Indigenous Nation that would be impacted by this conveyance.	As described in EIS Section 3.1.1.1, Land Selection Facts and Assumptions for Analysis, the State of Alaska has completed their land selections, and no more land can be selected. They will receive no more than their entitlement. Conveyance of their full entitlement may occur at any time regardless of the Secretary's decision on the EIS. Lifting of 17(d)(1) withdrawals would allow top filings from the State of Alaska to become effective selections. The increase in State selections would not change the State of Alaska's entitlement. The BLM used public land records (available in the Public Room at BLM offices or online at https://sdms.ak.blm.gov/sdms/) to determine if State top filings in the decision area occur on lands with additional encumbrances that would prevent those top filings from becoming effective selections. If there are no other encumbrances on the land, if the 17(d)(1) withdrawals were revoked, by law the top filings would become effective selections.	N
14378-8	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	The D1 lands within our traditional territory also encompass some lands currently leased for federal mining claims that were established prior to ANCSA, meaning that these federal mining claims are allowed on D1 lands. We are currently in consultation with the US government on how to steward these lands to prevent large-scale mining development. Removing D1 withdrawals would limit our ability to engage with the US government on these issues that directly impact the health of Jilkáat Aani K_a Héeni (Chilkat River Watershed). The map below illustrates the complex land jurisdictions.	The withdrawals in the Chilkat watershed in the decision area are effective selections by State, which would not be impacted by the Secretary's decision. If the State chooses to relinquish these selections, then the lands would remain in Federal management and Tribes could consult on future land management. Revocations do not preclude co-stewardship. If there are current Federal mining claims on 17(d)(1) withdrawals located prior to ANCSA, revocation of withdrawals would not impact them.	N
14651-9	Tim Gilbert	Maniilaq Association	The 17(d)(1) withdrawals by way of the original PLOs were implemented in compliance with Section 17(d)(1) of ANCSA. The current DEIS, with its emphasis on State top filings under ANILCA 906(e), strays from viewing 17(d)(1) withdrawals as part of the overall process toward fulfilling the settlement of Alaska Native aboriginal lands claims under ANCSA. This concern is amplified by BLM's statement that, "Some ANCs are under selected. If State top filings fall into place, the land would be segregated and would not be available for selection by ANCs that are under selected." See, DEIS 3-4. The federal government's fulfillment of our aboriginal land claims effects all Native peoples throughout the State no matter the region or entity.	See response to comment 14052-3.	N
14651-13	Tim Gilbert	Maniilaq Association	The fulfillment of NANA's entitlement is also concerning to Maniilaq if our Vietnam Veterans are going to have access to suitable local lands to select their allotments from. No revocation of 17(d)(1) withdrawals should occur until selections are completed by eligible Alaska Native Vietnam Veterans under the Alaska Native Vietnam-era Veterans Land Allotment Program (ANVVLAP).	The land within the decision area was opened to Alaska Native Vietnam-era selection of Native allotments under the Dingell Act on August 15, 2022 for most of the land through PLO 7912. This allowed the eligible individuals to select land before the full revocation of the 17(d)(1) withdrawals in the decision area was considered. If the Secretary chooses to fully revoke the 17(d)(1) withdrawals, the eligible individuals will still be able to select lands in the decision area. The only change is that State top filings will become effective selections and the individual will need to	N

Land Selection					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
				request the State to relinquish its selection to the land the eligible individual desires for a Native allotment.	
14702-9	Catherine Heroy	State of Alaska	Maintaining these PLOs frustrates the State's ability to receive its remaining land entitlement. Maintaining outdated ANCSA withdrawals restricts the State's ability to accurately prioritize its requests for transfer of statehood entitlement lands based upon sound science and the potential for future economic development of the land's resources. These withdrawals prevent some of the State's high priority top-filings from automatically attaching to selected lands in the region and prohibit Alaska from making final entitlement decisions consistent with the Statehood Act. Additionally, Alternatives B and C deprive the State's ability to acquire lower priority lands and thwarts the Congressional intent in the Alaska Statehood Act and ALTAA.	As described in EIS Section 1.3, Purpose and Need for Action, the need for the EIS is to make an informed public interest determination to support revocation in full, revocation in part, or full retention of the ANCSA 17(d)(1) withdrawals. The State currently has more than 12 million acres of effective selections and a remaining entitlement under the Alaska Statehood Act of roughly 5 million acres. Revoking the withdrawals may make more highly prioritized lands available to the State, but Section 906(e) of ANILCA only provided the State the opportunity to file on lands which were not available at the time of its selection. It did not, however, create an obligation for the lands to be made available to it. The State is also required to prioritize both its effective selections and its top filed selections, so the maintenance of the withdrawals should not have any impact on the State's ability to make such priorities. Alternatives which only open the lands for which the State is likely to receive title considering its current prioritization of its selections and top filings reflects a measured approach to land management to continue to protect the public interests in the land to the greatest extent possible while making the lands the State identified as its highest priorities available to it.	N

Social Systems					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10001-1	Lishaw Lincoln		Diminishing any kind of lands will affect mental health because that is our healing -- it's a healing priority.	Effects to mental and physical wellbeing are described in EIS Section 3.12, Social Systems.	N
10027-1	Austin Ahmasuk	Native Movement	Of the many, many claims within the EIS that BLM has made, I'd like to address one. Just -- just one. Native Movement will talk about a lot more in its -- its formal comment letter, but I'd like to talk about the one that was mentioned a couple times tonight. It's mentioned very briefly in the EIS, within the economic benefits section, and that is the -- the benefit, as BLM portrays it, a likely benefit under the one of the -- under one of the reasonably foreseeable development areas, and that is an increase in shareholder dividends. It isn't necessarily true that shareholder dividends create wealth. I don't think that it can be characterized as a benefit in the EIS. There's lots of material that would support -- support your claim that shareholders don't create wealth. They don't necessarily provide the kind of benefit that BLM is portraying. A lot of things go to what creates a sense of -- a sense of wealth or a sense of -- that kind of wealth, but it isn't a dividend, and it isn't fair to say in the EIS that one of the benefits of -- of choosing an action alternative is a shareholder dividend. Because it isn't -- it isn't -- guaranteed. No -- no -- no Native corporation is going to be guaranteeing wealth through dividends. They may be guaranteeing a small amount of money, but it isn't -- it isn't the same as wealth. And so when BLM makes this characterization it's making a claim about a benefit, but it has virtually no evidence to support that.	This would be an impact related to lands being conveyed to ANCs. Because effective selections by the State or ANCs could be conveyed regardless of the Secretarial decision, the analysis focuses on top filings, which would be affected by the Secretarial decision. Thus, text about shareholder dividends was removed from the EIS.	Y
13670-2	Rachel Lord	Alaska Food Policy Council	An excerpt from page 3-157 in the draft EIS "Environmental Consequences" section reads: "Therefore, any of the action alternatives would have mixed effects on food security, nutrition, and subsistence. Although the action alternatives may decrease the availability of subsistence resources or access to them, and adversely affect nutrition, food security, and cultural continuity, it would also increase employment and income, which would have beneficial effects on residents' ability to engage in subsistence activities and increase the ability to purchase foods from the store, thus reducing food insecurity." We believe this suggestion is not substantiated in the EIS, and is inappropriate given the magnitude of cultural significance of subsistence foods and the vulnerability of Alaska's supply chains. The preponderance of evidence clearly indicates that a reduction in subsistence access will have a negative impact on food security, nutrition, and subsistence.	The intent of NEPA is to disclose impacts, both beneficial and adverse. Thus, the EIS discloses the types and magnitude of impacts to subsistence access, resource availability, and resource abundance in EIS Section 3.14, Subsistence. The potential impacts to food security and cultural continuity are disclosed in EIS Section 3.12.1.2.2, Social Systems, Impacts Common to All Action Alternatives. Clarification was added to this section that the magnitude of impacts resulting from changes to subsistence would be commensurate with the magnitude of the impacts to subsistence (described in EIS Section 3.14, Subsistence).	Y
13670-4	Rachel Lord	Alaska Food Policy Council	While the draft EIS includes numerous statistics on the importance of subsistence harvests for Alaskans, we want to highlight three additional resources when considering food security - the Alaska Food Security and Independence Task Force 2023 Report, the Alaska Food Security Action Plan, and Feeding America's Minding the Meal Gap 2023 report.	Food security is addressed in EIS Section 3.12, Social Systems.	N

Social Systems					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13794-1	Bathsheba Demuth		I would urge the BLM to retain the current protections for D-1 lands. I base this opinion off of years of historian and contemporary research in several of the regions that would be impacted by the opening of these lands, including along the Yukon River and on the Seward Peninsula. These lands are key to the subsistence of people in these areas, for whom land-based harvesting is key culturally and practically. Historically, opening such lands generally leaves local peoples with legacies of pollution and disruptive, and do not provide long-term stable economic opportunity locally.	The impacts to subsistence are described in EIS Section 3.14, Subsistence, and in EIS Section 3.12, Social Systems, including indirect effects to cultural continuity.	N
13890-5	Bill Kane	Igiugig Village Igiugig Village Council Igiugig Native Corporation	For Indigenous communities in Bristol Bay, such as the Igiugig Village, the land is not merely a habitat, but a living landscape imbued with cultural, spiritual, and subsistence significance. These areas are integral to maintaining traditional practices, cultural sites, and subsistence economies. Igiugig Village residents, along with other regional Alaska Native families, have lived in relationship with and relied on these lands for hundreds of generations, with practices that are deeply interconnected with the natural cycles of the ecosystems.	The importance of subsistence and impacts to cultural continuity are described in EIS Section 3.12, Social Systems.	N
13957-1	–	Western Colorado University on Behalf of Students	Many Alaska Native mental health issues have origins in acculturation, or cross-cultural adjustment. Acculturation's impact on mental health is largely negative (McCarthy & Martello, 2005) and is associated with stress, anxiety, psychosomatic symptoms (pain with no biological cause), and depression. It is known that climate change will provide more stress to acculturation and perpetuate re-traumatization since a changing climate forces people to behave in new ways and with new adaptive cultural mechanisms (Kraemer et al. 2005). This draft EIS mentions the shift to a market-based economy as a benefit to communities, however, it fails to account for the impact on subsistence lifestyles and cultural values and the detrimental health and cultural impacts that will occur for the people of these communities. Community members experience mental health challenges, specifically associated with changes to cultural identity and gender roles while transitioning from a primarily subsistence to a market-based economy (Bell, et al. 2010).	See response to comment 10001-1.	N
13984-5	Chief Gary Harrison	Chickaloon Native Village	Throughout the public comment period it has been clear that Indigenous people hold the nearly 28 million acres of lands as sacred and imbued with spiritual significance and cultural heritage. Indigenous communities have deep historical ties to these lands, which have sustained their communities, livelihoods, cultural practices, and identities. The ANCSA D1 withdrawals have safeguarded these lands by largely closing them to development uses under public land laws, such as sale, settlement, or entry. The withdrawals have ensured that these lands remain intact and undisturbed, preserving critical resources for present and future generations of Indigenous peoples. Indigenous people have emphasized the interconnectedness of the living beings and the importance of maintaining harmony with these lands. The ANCSA D1 withdrawals have been instrumental in limiting land use and have protected and maintained public values, such as biodiversity, clean water, and healthy ecosystems. BLM asserts that revoking 17(d)(1) withdrawals under Alternative B, C, or D would not immediately trigger direct, measurable impacts to resources. While that may be true in the immediate sense, such a claim should not downplay the potential consequences of such actions in the long term. More importantly, if BLM revokes the 17(d)(1) withdrawals under Alternative B, C, or D there will be immediate and negative impacts to the Indigenous peoples and rural communities of Alaska in social, emotional and mental health which will also trigger direct, measurable, and negative impacts to the physical health of Alaska's Indigenous peoples and rural residents. Revoking ANCSA D1 withdrawals without clear stipulations or safeguards in place opens the door to potentially harmful development. Without adequate regulations or protections, the lands could be subjected to exploitation or degradation, leading to adverse impacts on resources such as wildlife habitat, water quality, and cultural heritage sites. While the analysis of RFD scenarios may provide insights into potential impacts, it is crucial to recognize that these scenarios are based on assumptions and projections. They do not guarantee the absence of impacts or accurately capture the full extent of potential harm. Real world conditions and development dynamics may differ from the scenarios presented in the EIS.	See response to comment 10001-1.	N
13984-9	Chief Gary Harrison	Chickaloon Native Village	BLM claims on page 3-79: "revocation of the 17(d)(1) withdrawals, when combined with the reasonably foreseeable and planned actions would increase economic activity in various regions of Alaska and generate jobs, income, and revenues". It is possible that development following the revocation of 17(d)(1) withdrawals may lead to economic activity in various regions of Alaska, but it is important to critically assess the notion that this will universally result in positive impacts. Economic growth and job creation often come at a high cost, and the assertion that these developments will have purely additive effects overlooks the potential negative consequences and trade-offs involved. The BLM's DEIS and BLM slide show presentation repeatedly suggest positive economic and social outcomes of potential development but fail to adequately analyze social determinants of health. In reality, if BLM proceeds with any alternative other than the 'no action	Potential health impacts are discussed in EIS Section 3.12.1.1.2, Cultural Continuity and Public Health. See also response to comment 14190-2.	N

Social Systems					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			alternative' they should conduct a thorough health impact assessment (HIA) for their chosen alternative.		
13984-10	Chief Gary Harrison	Chickaloon Native Village	BLM does not meaningfully address the impact of seasonal construction camps on Alaska Native people. Seasonal construction camps established near resource extraction sites have significant and often detrimental impacts on Alaska Native people and their communities. These impacts can manifest in various ways, leading to social, environmental, and cultural harm. Seasonal construction camps are associated with an influx of predominantly male workers into remote areas, leading to an increase in crime rates, including sexual assault, domestic violence, substance abuse, and property crimes. The presence of those camps can disrupt traditional Indigenous ways of life and erode cultural practices and values. Alaska Native communities have deep spiritual and ancestral connections to the land, which are threatened by industrial development and the influx of outside workers. Those camps can also lead to the loss of traditional hunting, fishing, and gathering grounds, undermining the cultural identity and self-sufficiency of Indigenous peoples.	EIS Section 3.12, Social Systems, was revised to include references to studies from other states that found an increase in non-local workers and camps led to an increase in violent crimes to Indigenous peoples.	Y
14013-1	Roberta Highland	Kachemak Bay Conservation Society	Industrial mining and man camps have a legacy of bringing violence and sexual assault to places it would otherwise not be. In a study conducted by U.S. Bureau of Justice Statistics, native women experience sexual assault at a rate seven times higher than white women when mining companies employ a male-dominant workforce and impose them upon Indigenous communities. https://www.colorado.edu/program/fpw/2019/03/14/new-report-finds-increase-violence-coincides-oil-boom	See response to comment 13984-10.	Y
14167-14	Olivia Karns	Tanana Chiefs Conference	Existing ANCSA (d)(1) withdrawals have safeguarded millions of acres across the subarctic in Alaska since the passage of ANCSA over 50 years ago. Even with this barrier to potential development of extractive industrialization and environmentally risky projects outside of the ANCSA (d)(1) land PLOs, Alaska Native people have been disproportionately impacted by the extractive industry sector. These harms are well-understood among primary care and behavior health medical professionals and include elevated risk of contagious diseases, cancers and birth defects associated with industry-driven environmental contamination and related health factors. Extractive mining development has affected access to clean water, and heavy metal releases are known to cause contamination of wild game and fish through bioaccumulation in animal tissue throughout the food chain. A myriad of social and cultural harms are precipitated from large industrial facilities. Some of the most robust records of adverse human health effects that are highly correlated with man camps at extractive industrial complexes are in reference to vital statistics associated with Missing Murdered Indigenous Women. Exposure to transient work forces and conditions in large extractive development camps are positively correlated with violence against women, obesity, diabetes, suicide rates, substance abuse, and generational trauma manifesting associated human health effects. Though correlations are widely appreciated, the broader understanding of relationships between industrialization and Indigenous communities with these types of sociological harms are in their infancy. Given the disproportionate impact removal of ANCSA (d)(1) withdrawals would have on land and resources inhabited by Indigenous communities, it is critical that the predictable social and cultural adverse effects on potential industrialization be considered at this time in the recommendations to the Secretary of the Interior.	See response to comment 13984-10.	Y
14190-2	Jasmine Jemewouk	Alaska Community Action on Toxics	Opening 17(d)(1) lands for mineral priority status directly threatens the migration of the Western Arctic Caribou herd that provides food for the entire Northwestern region of Alaska. We urge the Bureau of Land Management (BLM) to consider doing more than an Environmental Impact Statement but also a Community Health Impact Statement. The current Draft Supplemental Environmental Impact Statement fails to address the long-term effects on the communities in proximity to mining of metals and extraction of oil and gas. The mining process is destructive to the environment and releases chemicals such as cyanide and sulfuric acid that eventually contaminates local communities. These mining practices disproportionately expose Indigenous peoples that rely on a traditional diet. Short-term profits will replace past and future generations of sustainability and culture that they will need and depend on for themselves and their children. Mercury, arsenic, lead, and other heavy metals are all extremely toxic to human health. Developing children, expecting mothers, those with chronic illnesses and elders are especially more sensitive to the dire effects of mining and are disproportionately at risk of diseases associated with harmful exposures. Toxic metals are inevitably released into the air, water, and food chains during mining exploration and development and may cause harm in perpetuity. Mining is poorly regulated in Alaska and harms environmental and community health. The EPA Toxics Release Inventory (TRI) demonstrates that the metals mining industry is the largest toxic polluter in the United States. Alaska leads the nation in toxic releases reported to the TRI, largely as a result of the pollution from five mining operations including the Red Dog zinc-lead mine, the Fort	Health impact assessments may be completed at the project-specific level once sufficient detail on a project is available. As described in EIS Section 3.1.1.2, Reasonably Foreseeable Development Scenario, "no development plans have been submitted." Thus, it would be speculative to prepare an HIA for a yet-unknown project.	N

Social Systems					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			Knox gold mine, the Pogo gold mine, Kensington gold mine and Greens Creek silver mine according to the analysis. This damage would expand if additional areas were opened to mining		
14582-1	Jaylene Wheeler	Bering Sea Elders Group	Our traditional lands and waters are home to critical subsistence resources that are the foundation of food security for thousands of Alaska Native people, including the Cup'ik, Yup'ik, St. Lawrence Island Yupik, and Inupiaq people of the Yukon-Kuskokwim and Bering Strait regions. Harvesting our healthy, traditional foods from our traditional hunting and fishing grounds is more than just food security for our people--it is also essential for our cultural and spiritual wellbeing.	See response to comment 13794-1.	N
14588-1	Lisa Wax		I would just like to point out the mental health aspect. I was hoping perhaps somebody else would mention that, but I personally have seen profound - profound healing in these lands. I've seen trauma, addiction, grief. You know, it's not -- this land is not just a carbon storage, and it's not just feeding our people. It's much, much more. And when I mentioned that in Gakona at the meeting, I feel like it's important to note that a woman of the Caribou Clan Copper River from Kluti-Kaah amazingly mustered up the courage to share how broken her people are. And in trying to even discuss the potential of losing subsistence and healing access to her land really broke her down to where she had to leave the facility. But it was a very powerful moment. And I -- I just want that, because the EIS states that at least 111 social systems will be affected and potentially completely lost, devastated, decimated. And 111 social systems in an already struggling Alaska, as far as mental health and climates and animals and everything changing, I -- yeah.	As described in EIS Section 3.12.1.2.2, Social Systems, Impacts Common to All Action Alternatives, decreasing the role of subsistence in a community decreases cultural continuity and the ability of the community to pass on the cultural traditions. Text was added to clarify that the magnitude of these impacts would be commensurate to the magnitude of impacts to subsistence.	Y
14651-11	Tim Gilbert	Maniilaq Association	The practice of traditional ways of life holds more significance to our communities than mere nutritional value. Ceremonial activities like fishing, hunting, gathering are sacred to the way-of-life of the Inupiat communities. The passage of precious cultural knowledge between generations and sharing of traditional foods throughout the community is how we define our society and culture. The continuation of these practices is essential to the survival of our communities. The disruption of these traditional ways of life through the revocation of the PLOs on ANCSA (d)(1) lands would have significant adverse impacts to cultures that have thrived in Northwest Alaska since time immemorial.	See response to comment 13890-5.	N
14839-2	Austin Ahmasuk	Native Movement	But there are implications I believe that are not well addressed that extend just beyond environmental impacts. I searched diligently, but I did not find in this EIS anywhere where it explicitly detailed or talked about violence against Alaska Native people as a result of construction camps. In fact, it appears that the EIS is dismissive of the human impact, and the consequences of that will be that our lands and our bodies will be mistreated. The consequences of revocation, I'm firmly convinced, will extend to the fabric of our communities, our lives, and our culture will be impacted for many, many generations.	See response to comment 13984-10.	Y
9926-1	Sara Lizak		It is important for you to understand that subsistence resources are particularly valuable to the individuals I serve who are receiving welfare services and/or vocational rehabilitation services. This is because subsistence resources supplement many families grocery bills every year, including mine. On federally protected lands we are able to fish, pick greens, and a variety of berries during the summer months. To this day I still participate in those subsistence activities on D-1 protected lands. For many families living in rural Alaska, subsistence activities are not a choice, they are our way of life and part of our culture. If you want your children to eat fresh, healthy food here, you must participate in subsistence activities. "Fresh" food that is shipped in from elsewhere is often not fresh and halfway to its expiration date by the time it is put on our store shelves. Subsistence activities are also a form of self-employment for our Vocational Rehabilitation Program participants. Reducing opportunities for subsistence activities by opening up federally protected lands to resource development would hurt our program participants employment opportunities. Please see below regarding the federal regulations on self-employment through subsistence activities. I have included the links in this comment for reference. "34 CFR Part 371.6 - Subsistence means a form of self-employment in which individuals produce, using culturally relevant and traditional methods, goods or services that are predominantly consumed by their own household or used for noncommercial customary trade or barter and that constitute an important basis for the worker's livelihood.(Authority: Section 12(c) of the Rehabilitation Act of 1973, as amended; 29 U.S.C. 709(c))"	As described in EIS Section 3.12.1.2.2, Social Systems, Impacts Common to All Action Alternatives, impacts to subsistence access and resource abundance or availability would affect food security and the nutritional value of residents' diets.	N
9990-1	Jessica Winnestaffer		I'm just wondering, your -- your presentation, that was really fast. Fortunately I was taking pictures, so I could refer back. There was a lot of information, you know, spoken that wasn't in the writing, but there were assumptions made in the environmental impacts to social systems, and they were, like, best guesses, and it seems like Austin -- sorry -- my name's Jessica Winnestaffer....	All assumptions used in the analysis are detailed in EIS Section 3.1, Introduction and Methodology.	N

Social Systems					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			It seems like Austin's comment about the likelihood of BAFT (phonetic) would be another one of these likely assumptions that could be added, especially as there's a whole bunch of public hearings and meetings going to be happening in the near future. If there's clear report of this going on around the state, then it's likely that it would happen again.		
9990-2	Jessica Winnestaffer		<p>And I just would like, for the record, to make sure, just in case it doesn't come over from the question/answer, that there is some consideration to documenting the social system impacts of theft on ANCSA lands and other private lands, because as we heard earlier, there's good example of that. And it should be one of those hypothetical plausible scenarios, and it should be part of your presentation.</p> <p>And the health impact analysis process evaluates pros and cons. And while I think there have been some good jobs of evaluating pros and cons, the language that was highlighted in the question/answer about likely beneficial economic impacts has a con as well, and there are likely bene -- likely very negative social impacts. And so I think it's really dangerous to only highlight one side. And generally health impact analysis looks at both sides of every situation.</p>	Economic impacts are described in EIS Section 3.5, Economics. Impacts to social systems are described in EIS Section 3.12, Social Systems. All sections describe both adverse and beneficial impacts.	N

Soils and Permafrost					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10116-10	–	Alaska Wilderness League	I. Provide a comprehensive analysis to determine if any of the lands within or adjacent to these 17(d)(1) Withdrawals have permafrost soils and if so are subject to current or future melting and release of methane gases. If they are, analysis should be provided to consider retaining them in federal management and developing management plans to address how the melting of permafrost and the release of methane gases could be slowed or curtailed. Methane has more than 80 times the warming power of carbon dioxide over the first 20 years after it reaches the atmosphere. Even though CO2 has a longer-lasting effect, methane sets the pace for warming in the near term. At least 25% of today's global warming is driven by methane from human actions. (Environmental Defense Fund 2022).	EIS Section 3.13, Soils and Permafrost, identifies areas of permafrost in the decision area and how the acres of permafrost vary by alternative. See also response to comment 6-1.	Y
13211-7	Caitlin Roesler	US Environmental Protection Agency Region 10	The DEIS describes permafrost trends, stating that the "existing trend of climate change has affected and will continue to affect soils and permafrost. Warmer temperatures are melting ice and thawing permafrost, which are causing increased intensity of storms and coastal erosion events." Given that thawing permafrost is a general trend in Alaska, EPA recommends that permafrost trends be included in the FEIS' Reasonably Foreseeable Trends and Planned Actions narrative in Section 3.1.3.12	Permafrost melt was added to the list of bullets summarizing general climate trends in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions.	Y
13997-1	Melissa Shapiro, Brooke Woods	Permafrost Pathways at Woodwell Climate Research Center	<p>The ANCSA 17(d)(1) withdrawals provide a critical protection for lands underlain by permafrost soils. Without major mitigation action and maintenance of existing protections, such as 17(d)(1) PLOs, permafrost soils in the EIS coverage area are projected to disappear in the next two decades. Permafrost thaw is among the most significant-yet overlooked-climate phenomena in Alaska. This continuously frozen ground underlies roughly 38% of the exposed land surface in Alaska and is rapidly thawing due to rising temperatures across the Arctic. The resulting impacts of permafrost thaw are far reaching and dangerous:</p> <p>Permafrost thaw destabilizes the built environment leading to concrete and quantifiable physical asset loss and damage. Destruction of roads and essential infrastructure, such as utilities, homes, schools, and places of work that are underlain by permafrost interfere with income-earning opportunities and impose direct costs on local communities. Under moderate GHG emissions scenarios, 29% of roads, 23% of railroads, 11% of buildings across the Arctic will be affected by permafrost degradation; these percentages increase to 44%, 34% and 17% respectively, under high emissions scenarios. 6 These impacts are estimated to impose \$5.5 billion in damage to critical infrastructure in Alaska by 2100,7and contribute to cumulative damage of up to \$276 billion across the Arctic region by mid-century.</p> <p>For Alaska Native communities living most proximate to the D-1 lands in question, costs of repair and recovery due to permafrost thaw may be prohibitive and recurring. These costs are also far greater when ecosystem services and Indigenous Ways-of-Life are considered. Erosion and sedimentation from permafrost thaw can divert water courses, thereby compromising access to safe drinking water; disrupting subsistence fishing; ground subsidence and collapse affects use of traditional hunting grounds, caribou migration routes and breeding grounds; and shifts in species distributions or an increase in abundance of pests and pathogens may pose risks to both animal</p>	The potential for permafrost thaw as a result of the Secretary's decision is described in EIS Section 3.13, Soils and Permafrost. Additionally, climate change (including permafrost thaw) is noted in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions, as a reasonably foreseeable trend statewide. It was considered as part of the existing conditions and considered in the cumulative effects analysis of each resource section of EIS Chapter 3. See also response to comment 13211-7.	Y

Soils and Permafrost					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			and human health. The integrity of these already fragile ecosystems cannot withstand the further disruption that mining operations and extractive activities threaten to impose should BLM lift the PLOs. The Draft EIS does not sufficiently evaluate the irreversible degradation of permafrost soils that may result without D-1 protections.		
13997-2	Melissa Shapiro, Brooke Woods	Permafrost Pathways at Woodwell Climate Research Center	As Permafrost Pathways represents the single largest multidisciplinary initiative to advance permafrost thaw research and responses, we respectfully note with concern the dearth of a comprehensive, evidence-based permafrost analysis in the Draft EIS. Despite continually referencing the complexity and severity of permafrost thaw, and the acceleration of land degradation due to interactions with other natural disturbances, such as erosion, wildfire, flooding - the Draft EIS falls short of examining reasonably foreseeable effects of lifting 17(d)(1) protective land orders on the permafrost lands in question.	EIS Section 3.13, Soils and Permafrost, identifies areas of permafrost in the decision area and how the acres of permafrost vary by alternative. The action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually. As described in EIS Section 3.1, Introduction and Methodology, there remain implications that are unknowable on an individual parcel-by-parcel level should the Secretary revoke the 17(d)(1) withdrawals. Unknowable variables include if or to whom lands would be conveyed if the 17(d)(1) withdrawals are revoked. The impacts of exactly where infrastructure would be constructed, for what purpose, and any other specific (as yet unproposed) projects may be enabled by that infrastructure would be evaluated at the project-specific level once details on any proposed development are known. The EIS does evaluate the general effects of infrastructure on permafrost.	N
13997-3	Melissa Shapiro, Brooke Woods	Permafrost Pathways at Woodwell Climate Research Center	BLM appropriately recognizes that Alaska is at the forefront of rapid environmental change: Rising temperatures and severe climate hazards are catalyzing irreversible changes to the Alaskan landscape. BLM further acknowledges that such changes include "erosion, permafrost thaw, thermokarsting, cryoturbation, and solifluction, which can disturb sites, degrade preservation, and eventually destroy cultural resource sites." Yet, in response to the question of "How would revocation of 17(d)(1) withdrawals affect soils and permafrost?" the Draft EIS offers minimal consideration, stating only that: The temporal scale for impacts would be long term...However, depending on site-specific permafrost and soil conditions coupled with specific development and construction plans, impacts to soils and permafrost may be more immediate but have long-term consequences. Any permafrost thaw, thaw consolidation, or non-thaw consolidation of soils due to development activities would cause irreversible changes to the existing conditions. The Draft EIS proceeds to conclude that, while "[e]xploration and development activities such as construction of roads, pads, and airstrips directly impact permafrost conditions," such impacts would be "too speculative" to describe (emphasis added). While there are some aspects of permafrost thaw that remain subject to speculation-including the rate of thaw, and the level and nature of carbon emissions that thaw may release over the next century- the observable and measurable impacts of permafrost thaw on existing infrastructure, ecosystems, and communities in Alaska are increasingly well-understood. Advances in environmental monitoring, assessment, and projections of permafrost thaw impacts are being made in real time by technical experts from federal government agencies, including NOAA, US ACE, USGS, Indigenous Knowledge-holders, permafrost scientists at Permafrost Pathways, the University of Alaska at Fairbanks, and several engineering contractors working with Alaska Native communities. The best available science-which includes Traditional Knowledge- on permafrost thaw is helping to inform community-led adaptation planning in lands within and near the remaining lands covered by 17(d)(1) protective orders. Examination of these concrete and non-speculative impacts and the urgent need for US federal agency responses are documented in key reports, including inter alia: * The 2019 Statewide Threat Assessment prepared for the Denali Commission, which evaluated permafrost, flooding, and erosion that is contributing to the destabilization of ground the consequent effects on homes, schools, roads, boardwalks, airstrips, and critical military and defense infrastructure across the state. * A 2022 report from the Government Accountability Office, which subsequently considered the 2019Threat Assessment and the extent to which US federal agencies are supporting Alaska's affected 229 Native Tribal communities. Despite successfully adapting to these challenges to date, the severity of permafrost thaw and impacts of climate change are forcing many communities to make difficult decisions about pursuing protection in place, managed retreat, or community-driven	See response to comment 13997-2.	N

Soils and Permafrost					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>relocation. Unfortunately, there is currently no framework to facilitate interagency coordination of these decisions, nor a dedicated source of funding for implementation.</p> <p>* The "Unmet Needs of Environmentally Threatened Alaska Native Villages" report published by the Alaska Native Health Consortium in January 2024, which was prepared in collaboration with NOAA and several other federal agencies. Given the findings of this comprehensive study, lifting any remaining 17(d)(1) protections would be antithetical to avoiding further harm to Alaska Native communities and the lands in question.</p> <p>As part of the government's efforts to revitalize NEPA, it is necessary for DOI and its components to more adequately consider these documented and complex interactions of permafrost thaw with other ecological processes. These and other publications examine the extent to which increased frequency and severity of boreal wildfires, flooding, and extreme weather events (such as typhoons) in areas underlain by permafrost are further catalyzing irreversible landscape changes. These changes-which include lake drainage and ground subsidence,and which disrupt habitats and ecosystems across Alaska, are far from speculative.</p>		
14686-1	Brooke Woods, Melissa Shapiro	Permafrost Pathways at Woodwell Climate Research Center	<p>The ANCSA 17(d)(1) withdrawals provide a critical protection for lands underlain by permafrost soils. Without major mitigation action and maintenance of existing protections, such as 17(d)(1) PLOs, permafrost soils in the EIS coverage area are projected to disappear in the next two decades. Permafrost thaw is among the most significant-yet overlooked-climate phenomena in Alaska. This continuously frozen ground underlies roughly 38% of the exposed land surface in Alaska and is rapidly thawing due to rising temperatures across the Arctic. The resulting impacts of permafrost thaw are far reaching and dangerous: Permafrost thaw destabilizes the built environment leading to concrete and quantifiable physical asset loss and damage.</p>	See response to comments 13997-2 and 13211-1.	N
14686-3	Brooke Woods, Melissa Shapiro	Permafrost Pathways at Woodwell Climate Research Center	<p>The Draft EIS does not sufficiently evaluate the irreversible degradation of permafrost soils that may result without D-1 protections. As Permafrost Pathways represents the single largest multidisciplinary initiative to advance permafrost thaw research and responses, we respectfully note with concern the dearth of a comprehensive, evidence-based permafrost analysis in the Draft EIS. Despite continually referencing the complexity and severity of permafrost thaw, and the acceleration of land degradation due to interactions with other natural disturbances, such as erosion, wildfire, flooding - the Draft EIS falls short of examining reasonably foreseeable effects of lifting 17(d)(1) protective land orders on the permafrost lands in question. BLM appropriately recognizes that Alaska is at the forefront of rapid environmental change: Rising temperatures and severe climate hazards are catalyzing irreversible changes to the Alaskan landscape. BLM further acknowledges that such changes include "erosion, permafrost thaw, thermokarsting, cryoturbation, and solifluction, which can disturb sites, degrade preservation, and eventually destroy cultural resource sites." Yet, in response to the question of "How would revocation of 17(d)(1) withdrawals affect soils and permafrost?" the Draft EIS offers minimal consideration, stating only that: The temporal scale for impacts would be long term...However, depending on site-specific permafrost and soil conditions coupled with specific development and construction plans, impacts to soils and permafrost may be more immediate but have long-term consequences. Any permafrost thaw, thaw consolidation, or non-thaw consolidation of soils due to development activities would cause irreversible changes to the existing conditions. The Draft EIS proceeds to conclude that, while "[e]xploration and development activities such as construction of roads, pads, and airstrips directly impact permafrost conditions," such impacts would be "too speculative" to describe (emphasis added).</p> <p>While there are some aspects of permafrost thaw that remain subject to speculation-including the rate of thaw, and the level and nature of carbon emissions that thaw may release over the next century- the observable and measurable impacts of permafrost thaw on existing infrastructure, ecosystems, and communities in Alaska are increasingly well-understood. Advances in environmental monitoring, assessment, and projections of permafrost thaw impacts are being made in real time by technical experts from federal government agencies, including NOAA, US ACE, USGS, Indigenous Knowledge-holders, permafrost scientists at Permafrost Pathways, the University of Alaska at Fairbanks, and several engineering contractors working with Alaska Native communities. The best available science-which includes Traditional Knowledge- on permafrost thaw is helping to inform community-led adaptation planning in lands within and near the remaining lands covered by 17(d)(1) protective orders. Examination of these concrete and non-speculative impacts and the urgent need for US federal agency responses are documented in key reports, including inter alia:</p> <ul style="list-style-type: none"> The 2019 Statewide Threat Assessment prepared for the Denali Commission, which evaluated permafrost, flooding, and erosion that is contributing to the destabilization of ground the consequent effects on homes, schools, roads, boardwalks, airstrips, and critical military and defense infrastructure across the state. 	See response to comment 13997-2. See response to comment 13986-3 for a discussion on the level of detail included in the EIS.	N

Soils and Permafrost					
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			<ul style="list-style-type: none"> A 2022 report from the Government Accountability Office, which subsequently considered the 2019 Threat Assessment and the extent to which US federal agencies are supporting Alaska's affected 229 Native Tribal communities. Despite successfully adapting to these challenges to date, the severity of permafrost thaw and impacts of climate change are forcing many communities to make difficult decisions about pursuing protection in place, managed retreat, or community-driven relocation. Unfortunately, there is currently no framework to facilitate interagency coordination of these decisions, nor a dedicated source of funding for implementation. The "Unmet Needs of Environmentally Threatened Alaska Native Villages" report published by the Alaska Native Health Consortium in January 2024, which was prepared in collaboration with NOAA and several other federal agencies. Given the findings of this comprehensive study, lifting any remaining 17(d)(1) protections would be antithetical to avoiding further harm to Alaska Native communities and the lands in question. <p>As part of the government's efforts to revitalize NEPA, it is necessary for DOI and its components to more adequately consider these documented and complex interactions of permafrost thaw with other ecological processes. These and other publications examine the extent to which increased frequency and severity of boreal wildfires, flooding, and extreme weather events (such as typhoons) in areas underlain by permafrost are further catalyzing irreversible landscape changes. These changes-which include lake drainage and ground subsidence, and which disrupt habitats and ecosystems across Alaska, are far from speculative.</p> <p>The authors of this comment caution that a narrowly-drawn and conclusory review of permafrost thaw in BLM's EIS will serve only to perpetuate immediate threats to human health, safety, and security. And any subsequent projects that may be approved upon the revocation of 17(d)(1) protections are likely to be rendered inoperable due to permafrost degradation. The NEPA review process should take a hard look at permafrost thaw processes and dynamics to ensure that decisions-such as the proposed revocation of 17(d)(1) withdrawals - are not arbitrary and capricious.</p>		

Subsistence					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10000-1	Katie Finnesand		And, you know, over the last years we've been seeing a lot more pressure hunting and fishing with the adjacent, you know, state system -- state managed system. And I just feel that we can't afford to limit ourselves any further by relinquishing federal land and do away with that -- that subsistence priority.	Effects to subsistence resulting from a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
10000-2	Katie Finnesand		I'd like to see them tables break out exactly how much acreage we're talking about that's impacted, the list of all of the communities that are impacted, and -- and how do you assess a community, whether it's impacted or not.	Acres losing Federal subsistence priority and overlapping areas likely to be developed, by community, are provided in EIS Table 3.14-4, Percentage of Use Areas More Likely to Be Developed or Losing Federal Subsistence Priority, if Overlapping 17(d)(1) Withdrawals are Revoked under Alternative B; EIS Table 3.14-8, Percentage of Use Areas More Likely to Be Developed or Losing Federal Subsistence Priority, if Overlapping 17(d)(1) Withdrawals are Revoked Under Alternative C; and EIS Table 3.14-11, Percentage of Use Areas More Likely to Be Developed or Losing Federal Subsistence Priority, if Overlapping 17(d)(1) Withdrawals are Revoked Under Alternative D. The EIS assumed there is a negative impact anywhere within the community's use area that would lose Federal Subsistence Priority or areas more likely to developed. When the use area was not known, the analysis assumes that any land within 50 miles of the community is within its use area.	N
10002-1	Barry Whitehill		So I guess as an individual I'm testifying tonight, but I'm also actively involved with Backcountry Hunters & Anglers, because as a hunter I've been fortunate in my lifetime. The only meat and fish on my table is stuff that I've procured myself or my family has, and that still goes on today. And with that it's just like it was described with the subsistence users. We share the game, we share the fish. A lot of my friends that are from subsistence communities -- everybody's involved with our -- our harvest, and -- and so I've -- I've had that same opportunity out on the landscape to be with users on, like, the Koyukuk and the Porcupine system and whatnot. So from that I realize that as our world gets smaller and smaller and more fragmented these areas become more and more critical to the landscape for the con -- the connection, and every time we throw a manmade obstruction in the way it just -- it takes away from the opportunities that we	Effects to subsistence access and competition are discussed in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives.	N

Subsistence					
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			<p>have.</p> <p>And growing up in the Northwest, eastern Washington -- I lived in Wyoming, Nevada, Idaho -- I've seen that landscape get reduced farther and farther. And what it does, it just exacerbates the conflict between user groups.</p> <p>And what I'm afraid of, if these lands are revoked, that the conflicts are going to be much more increased, and -- and that's something I'd hate to see. Because a lot of these people that I spend time with on the land, it's critical to them, and I feel it's critical to me.</p>		
10005-1	Diloola Erickson	Native Movement	<p>And my comment is, you know, opening up these lands, these 28 million acres of lands, to leasing opens the door for expanded industrialization on our lands. And these lands have supported indigenous people since time immemorial. For generations they have supported us.</p> <p>And just in the last hundred years under federal and state management practices our resources have dwindled at a rapid and terrifying rates. You know, we have had five decades of federal management, probably longer, and state management also, and you know, those practices are ruled by largest sustainable yield from those resources. That is not an indigenous practice. Our practice is to sus -- harvest what is sustainable, not just for us, but the other communities that depend on it, and also for our animal relatives that use those resources too.</p> <p>And so that is the kind of management we have to start thinking about when we think of how are we going to use our lands from now into the future, and not for us. We're not thinking about how are we using these lands for us to benefit the most. It's how are we using these lands so that our grandchildren have something for them to manage too. I want us to leave a legacy of richness to continue that. And not just for Native people, but for the non Native people that live here in Alaska.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives. Cumulative impacts on subsistence are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
10005-2	Diloola Erickson	Native Movement	<p>I was not raised up here on my own lands. I raised on (speaking Native language) in the village of Hoonah, and I was cared for and loved by a lot of Tlingit people down there, and I'm grateful for that.</p> <p>And on my reconnection journey to my homelands, one of the things that gave me the most sense of belonging, and that I was a true -- like a -- truly a part of my culture was my ability to go home and fish, and to sit with my cousins in the smoke house, and to learn how my aunties processed their fish, and to learn how that had been passed down from generation to generation, and to use the Muhundanese (phonetic) that my great, like, uncles and grandpas had made and gifted and that were handed down.</p> <p>And my daughter doesn't have that. There's -- there's nothing for her to do. And I think about when I am 70, when I'm an elder, when I'm in my end stages of life, and their grandkids want to give me something and care for me, will they have food to give me? Will they have caribou to harvest to give me? Will they have moose to feed me?</p> <p>And I don't say that out of a selfish thing. I say that because when I learned how to fish it gave me the biggest sense of pride to bring fish heads to an elder who cared and loved for me from Tanacross, and to be able to gift her that and feel the love and appreciation from her for being able to bring her something from my homelands.</p>	Cumulative impacts on subsistence, including impacts to culture, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
10017-1	Vernon Carlson		<p>But my question right now is, what's the difference between a PLO, which I think is what you call these land withdrawals, and selected lands, how how do you differ that? Because when I look at this map here, and this is around Cantwell -- this map was printed in 2007 by BLM -- there's no yellow marks on it here. We've had no subsistence hunting on federal lands around here for the last 40 years since the feds took over in '92 or so. So I'm like -- I'm confused as to how subsistence is going to be affected or not affected.</p> <p>That's -- that's question one. Like, what's the difference between them? Because, like, if they were BLM lands, you're going to withdrawal them, why are we not hunting on them? Why haven't we been hunting on them and have our subsistence priority.</p>	<p>All Federal lands defined as public lands under ANILCA are open to Federal subsistence priority and the Federal Subsistence Board is the decision-making body that oversees the Federal Subsistence Management Program. State of Alaska and ANCSA land selections do not meet the definition of public lands under ANILCA.</p> <p>EIS Section 3.14, Subsistence, analysis is based on the most current available land status data. Lands that would lose Federal subsistence priority upon revocation of withdrawals under each Alternative are described in EIS Section 3.14.1.2, Environmental Consequences.</p>	N
10017-2	Vernon Carlson		<p>When I look at what this presentation here [as spoken], and I feel the addressing the subsistence issues is totally being un -- unmet, particularly for the residents of Cantwell.</p> <p>I -- I can tell you for certain, anybody that's been here for a long time, such as myself, we hunt we do not hunt on federal lands at all because of the confusion. We -- we all get our permits every year just to keep our name on the books, but nobody hunts, because the only place we can go is in Denali National Park. And absolutely nobody that's been here for any more than 10 years goes inside of Denali National Park because the -- the confusion that this system's creating.</p>	See response to comment 10017-1. EIS Section 3.14, Subsistence, analysis is based on available subsistence harvest and use area data. Impacts to subsistence resulting from a loss of Federal subsistence priority, including confusion about hunting regulations, are discussed in the Loss of Federal Subsistence Priority section in EIS Section 3.4.1.2.2, Impacts Common to All Action Alternatives.	N
10023-1	Maddie Halloran	Alaska Wilderness League	<p>Our organization works to protect public access and the environment on the federal lands across Alaska. I also hold a masters degree in natural resources focused on fishery biology from Cal Poly Humboldt. My thesis focused on salmon population biology, and I spent a long time learning about the importance of retaining climate refugia and large, intact, connected landscapes to maintain healthy salmon populations, a crucial ecosystem service that these lands under consideration in this EIS provides.</p>	Potential impacts to subsistence access, resource abundance, and resource availability resulting from revocation of withdrawals are described in EIS Section 3.14, Subsistence.	N

Subsistence					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>Across Alaska, lands managed by BLM from Bristol Bay to the Yukon Kuskokwim region provide subsistence resource -- resources for over a hundred Alaska Native communities. These diverse landscapes nourish incredible wildlife populations and serve as massive carbon sinks for the planet.</p> <p>These communities are at risk of losing not only the federal subsistence priority and access to subsistence areas if these withdrawals are revoked, their food security is even further at risk if these lands are developed.</p> <p>As an Alaskan and an environmental scientist I urge you to keep these landscapes intact. These lands are incredibly valuable to so many people and animals for so many reasons. I hope they can continue to support all five species of Pacific salmon, three of North America's largest caribou herds, abundant moose populations, and a vast number of migratory bird species, as well as the communities that rely on intact landscapes for their food, security, health, and wellbeing.</p>		
10058-1	Raymond Oney	Yukon-Kuskokwim Delta Subsistence Regional Advisory Council; Yukon-Kuskokwim Delta Subsistence Regional Advisory Council	<p>In the Bering Sea-Western Interior BLM planning area there are 13,322,000 acres of withdrawal under evaluation in the DEIS. A vast majority of these lands are located along or near the Yukon and Kuskokwim rivers and their tributaries, in areas that provide critical habitat, migration corridors, and ecosystem services. Our Council cannot emphasize enough the importance of keeping as much of this land as possible under Federal subsistence jurisdiction and closed to development. The world is changing at a fast pace and the future presents many uncertainties. We need as many levels of protection left in place as possible because our resources and traditional practices are already under threat. Our region is experiencing significant food insecurity due to the on-going salmon crisis and caribou hunting closures. Residents of our region are already fighting the proposed Donlin Gold Mine and the impacts it will have to our subsistence lifeways. Revoking withdrawals in our region will result in even more mineral development projects and threats to subsistence. Keeping lands open to Federal subsistence management allows for a rural preference of use in times of conservation and gives rural residents a greater opportunity to continue customary and traditional practices, which sustain us nutritionally, culturally, and spiritually.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence. Cumulative effects on subsistence, including cultural impacts, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
10060-1	Nissa Pilcher	Western Interior Subsistence Regional Advisory Council	<p>Federally qualified subsistence users in the Western Interior Region will be highly impacted by the BLM decisions on the D-1 lands withdrawals because of the large contiguous block of BLM managed lands in our region under review through this EIS process. The 28 million acres of BLM managed lands that are analyzed in the EIS support important subsistence resources in our region and throughout the state. They are central to fish spawning and rearing habitat and contain important habitat for moose and caribou. The previous administration prepared five Public Land Orders (PLOs) without adequately consulting the federally recognized Tribes and federally qualified subsistence users who will be impacted by the decisions. The flawed decision to advance the PLOs was also made without consideration of how lifting D-1 lands orders could negatively affect cultural use areas, fish and wildlife habitats, subsistence resources, hunting, fishing, gathering rights, and the food security of hundreds of communities and thousands of federally qualified subsistence users.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
10116-6	–	Alaska Wilderness League	<p>With the food insecurities in rural Alaska it is critical to have a more robust analysis of what are the potential cumulative impacts if this land is transferred out of federal management. How will development potential look different with State versus Federal regulations?</p>	The RFD scenario in EIS Appendix D provides an analysis of which lands have a high, medium, or low development potential. Cumulative effects on subsistence access and resource abundance and availability are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
102-1	Jeremy Robida		<p>I personally use these lands for recreation, subsistence activities and food gathering, and mining activity for example in the Thompson Pass, Valdez vicinity in particular would negatively impact these activities.</p>	Effects to subsistence from development activities are described in the Increase in Lands Open to Development sections in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
106-2	–	Kobuk Valley Subsistence Resource Commission	<p>Subsistence users in the Northwest Arctic (Kobuk-Seward region) will be highly impacted by BLM's decision on whether to maintain the D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitat needed for species migration and adaptation to our rapidly changing environment. Communities that depend on caribou, salmon, moose and other subsistence resources are already encountering reductions in populations.</p> <p>In the Kobuk-Seward region, subsistence harvesters are facing food insecurity while being asked to harvest less to preserve species. As environmental changes continue to increase pressure on resources, we believe it is in the public interest to protect intact lands and pristine waters as a precautionary and preventative approach to resource decline. Already the decline of the sheep and caribou populations are impacting families' food security. High water years on the Kobuk and Noatak rivers have impacted summer fishing opportunities, and erosion and permafrost melt threaten water quality and people's camps as well.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N

Subsistence					
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112-2	Eugene Paul, Suzanne Little	Holy Cross Tribe; Bering Sea Interior Tribal Commission	Most Alaska Native people are impacted by the BLM's land management planning decisions. BLM managed lands support important subsistence resources and underpin food security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
12375-1	Kathy Nolasco		Alaska's BLM D-1 lands support by fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions. I urge you to retain the D-1 protections on all 28 million acres under review.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
12889-1	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	In 2022 and 2023, the Working Group recommended a reduced subsistence harvest limit across the range of the WACH of four caribou per year, only one of which may be a female, as well as a pause on all non-resident harvest. This is a sharp decrease from the current limit of five caribou per day. It is not a recommendation we made lightly, knowing that it will have impacts on those who most rely upon caribou. However, considering persistent declines we felt compelled to act in alignment with the Working Group's Cooperative Management Plan. When the people we represent are being asked to reduce their use of the WACH because of low herd size, taking an action that would reduce Federal subsistence priority and potentially allow increased development that the DEIS admits may impact caribou habitat use, population size, availability for subsistence, and likelihood of recovery is ill advised. The DEIS acknowledges that between 65-119 communities, many classified as "environmental justice populations" in the DEIS, could be affected by loss of Federal subsistence priority under Alternatives B-D, affecting between 50,000 - over 1 million acres of land (p.2-12). This includes many of the communities represented by the Working Group. We urge that D1 Withdrawals on these lands be maintained.	Effects to subsistence resulting from a loss of Federal subsistence priority, including in areas where resource populations are currently vulnerable, are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
12889-2	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	We also are concerned about the DEIS' acknowledgement that increasing the amount of land under management of the State of Alaska by revoking D1 Withdrawals could increase non-local hunting (p.3-243). Though not acknowledged in the DEIS, this may have the effect of concentrating subsistence harvest as local harvesters seek to avoid non-local hunters. The Working Group has heard concerns from members and others in the communities we represent about user conflict between local and non-local hunters and does not want to see such incidents increase. Similarly, one of the challenges with D1 Withdrawal revocation mentioned in the DEIS is the potential for changes in hunting regulations in lands transferred out of Federal management to lead to increased confusion and potential avoidance of areas with recent changes (p.3-171). The Working Group has consistently advocated for aligning hunting regulations where possible to reduce confusion, along with clear communication. The DEIS acknowledges that differences in subsistence management between Federal and State lands can affect harvester success (Appendix C, p.19). We are concerned about increased conflict, confusion, and reduced subsistence harvests if D1 Withdrawals are revoked.	The Loss of Federal Subsistence Priority section in EIS Section 3.4.1.2.2, Impacts Common to All Action Alternatives, addresses the potential increase in confusion associated with a change in subsistence management. EIS Section 3.14, Subsistence, was edited to address the potential concentration of subsistence harvesters in certain areas to avoid conflict with nonlocal subsistence users, and potential impacts on harvest success. For example, text was added to the Loss of Federal Subsistence Priority section in EIS Section 3.4.1.2.2, Impacts Common to All Action Alternatives, to discuss the correlation between an increase in moose hunters in a GMU and decreased harvest success for local hunters, and the potential for concentration of subsistence harvests to avoid nonlocal harvesters.	Y
12889-5	Vern Cleveland, Holly Spoth-Torres	Western Arctic Caribou Herd Working Group; Western Arctic Caribou Herd Working Group	The DEIS notes that the subsistence use area for the village of Hughes does not overlap any of the D1 Withdrawals (p.3-168). Hughes is one of the communities represented on the Working Group, reflective of its reliance upon and valuing of the WACH. We emphasize that communities like Hughes may feel the impacts of opening of D1 Withdrawals beyond areas of spatial overlap if the species they rely upon, like migratory caribou, are affected in one part of their annual range and then travel to the communities' subsistence use areas. This is acknowledged in Appendix C (p.22, 25) and it is important that language consistently reflects this throughout the EIS. Impacts to all communities within the range of mobile species like caribou should be carefully accounted for in the FEIS.	EIS Section 3.14, Subsistence, considers impacts, direct and indirect, to all communities within 50 miles of 17(d)(1) withdrawals, regardless of the communities' use area overlap. The EIS addresses potential indirect impacts to resource availability of resources such as caribou in EIS Section 3.14.3.2, Environmental Consequences, and in EIS Section 3.14.1.2.7, Cumulative Impacts, which addresses impacts to communities who "use 17(d)(1) withdrawals or who harvest resources that migrate through 17(d)(1) withdrawals." EIS Sections 3.14.2.2.4 and 3.14.2.2.5, Subsistence, Alternative C and Alternative D respectively, were edited to include text about broader indirect impacts that could occur for communities outside the vicinity of 17(d)(1) withdrawals if there are changes in resource abundance for migratory reasons.	Y
12994-1	Macy Kenworthy	Inupiaq	As Alaska Natives, we are still facing attempted cultural genocide as our cultures rely heavily on the land which is being destroyed by climate change and non-sustainable resource development. Federal agencies, such as BLM have been saying for decades that they want to work with Native communities and have even started incorporating Native ways of knowing in their work. Choosing to ignore Native ways of knowing now just shows that not much progress has been made with federal entities and Native communities are still ignored by the government when it comes to our livelihood. We know what will happen if we open these lands up to development. Our lands will be pillaged for the resources that are still contributing to climate change. The animals that federal agencies (including BLM) are sworn to protect would be harmed and our people would have even less food to sustain our diets. Opening these lands would directly go against the mission of the BLM and would be a slap in the face to Native peoples of Alaska.	The subsistence analysis is directly and indirectly informed by Indigenous knowledge, including knowledge provided during government-to-government consultation, public scoping meetings, and in existing ethnographic research based on interviews with Indigenous residents. The BLM has engaged in direct consultation with Indigenous and rural communities throughout the EIS process and held ANILCA 810 hearings and solicited public comments. Text has been added to EIS Section 3.14, Subsistence, to describe how Indigenous knowledge is incorporated into the EIS findings.	Y

Subsistence					
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13139-1	Tracy Charles-Smith	Alaska Wilderness League; Native Village of Dot Lake	Most Alaska Native people are impacted by the BLM's land management planning decisions. BLM-managed lands support important subsistence resources and serve as the breadbasket for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters. A tribal member from the village of Anvik on the lower Yukon River said it well, "We don't own the land, but we belong to the land and whatever happens to the land happens to us." The previous administration prepared five Public Land Orders (PLOs) without engaging Indigenous people, who are most impacted by the decisions, in the decision-making process. The flawed decision to advance the PLOs was also made without any consideration of how lifting the D-1 protections and allowing extractive resource development could negatively affect cultural use areas, fish and wildlife habitat, subsistence resources, hunting, fishing, and gathering rights, and food security for hundreds of communities.	Section 810(a) of ANILCA requires that an evaluation of subsistence uses and needs be completed for any Federal determination to "withdraw, reserve, lease or otherwise permit the use, occupancy, or disposition of public lands." If the ANILCA 810 analysis finds that a significant restriction remains, Section 810 hearings must be held in the affected communities, and if the significance determination remains following the hearings, the Federal agency may approve or prohibit the action based on whether such a significant restriction of subsistence uses is necessary and consistent with sound management principles for the use of public lands; and whether reasonable steps would be taken to minimize adverse effects on subsistence uses and resources resulting from the action(s). Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13211-3	Caitlin Roesler	US Environmental Protection Agency Region 10	EPA also recommends the areas of the project most impacted by changes to subsistence resources be considered as candidates to conduct Health Impact Assessments (HIAs), especially in the case of future development. This may include a screening process to determine which aspects of health (including but not limited to public, environmental, mental, social, and cultural health) could be impacted by changes in land use. Consideration of both chemical and non-chemical stressors (e.g., exposure to violence) in evaluating health impacts provides an opportunity to consider the potential cumulative impacts to the affected population. For example, non-chemical stressors (e.g., exposure to violence) may be of particular concern near camps of temporary workers. Depending on the screening results, an HIA may need to be conducted to determine the direct, indirect, and cumulative impacts to health. We recommend the BLM partner directly with local, state, tribal, and federal health officials to determine the type of analysis needed to assess health impacts and conduct the analysis, and to determine appropriate and effective mitigation of potential health impacts.	See response to comment 14190-2 as related to a health impact assessment. Additionally, the action of revoking withdrawals across approximately 28 million acres is largely administrative in nature; nearly all future implementation-level actions would require additional environmental analysis under NEPA. The EIS focuses on the potential impacts of non-discretionary actions that would occur if the withdrawals were revoked: the staking of new mining claims and State top filings becoming effective selections under the Alaska Statehood Act. The EIS takes a programmatic approach to the analysis by describing these actions and the extent to which the BLM believes they could occur with the acknowledgment that the BLM is not able to know the specific location and timing of these actions individually.	N
13265-3	Mary Glaves	Backcountry Hunters and Anglers	Alaska is at the forefront of climate change and widespread impacts are already occurring including melting permafrost, coastal and river erosion, and habitat transformation that affects wildlife, even without further impact of human activity. These impacts directly affect subsistence and cultural use, which the current withdrawals protect and have done so, for 50+ decades.	Existing effects on subsistence, including impacts from climate change, are described in EIS Sections 3.14.1.1.4, 3.14.2.1.2, and 3.14.3.1.1, Existing Conditions.	N
13267-1	Bonnie Gestring	Earthworks	Nearly 75% of all federally recognized Tribes in Alaska are impacted by the BLM's land management planning decisions. BLM-managed lands support important subsistence resources and serve as the breadbasket for thousands of Athabaskan, Aleut, Denaina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters. Three tribal consortia organizations, representing 118 federally recognized Tribes joined the Bering Sea Intertribal Commission and 78 Tribes in a recent letter urging the BLM to retain the existing (d)(1) protections. By prioritizing climate-vulnerable and historically marginalized communities, these protections would meet many of the nation's environmental justice goals.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence. How those effects result in impacts to environmental justice communities is further analyzed in EIS Section 3.6, Environmental Justice. The information raised in this comment have been captured in those sections.	N
13323-1	-	Copper Country Alliance	Copper Country Alliance strongly believes Alternative A is the right choice for East Alaska D-1 lands. Maintaining the D-1 protection that is already in place will strengthen wildlife habitat, support hunting and fishing and subsistence opportunities and will help keep traditional cultural values alive. East Alaska's wildlife is struggling with climate change. The Nelchina Caribou herd is in severe decline. Caribou populations have dropped from 35,000 to less than 10,000 animals in a two year period. Moose populations are down. Resident and migratory birds are declining and salmon in the Copper River are smaller, with erratic runs. These subsistence resources depend on large, intact landscapes to thrive. With roads, noise, machinery, and pollution, Industrial development can fragment landscapes and watersheds and harm fish and wildlife habitat and displace subsistence resources. Copper River Basin and surrounding regions are culturally very tied to the animals which feed us, teach us respect, and bring us joy. We consider them partners in this land we love. Copper Country Alliance urges you to protect, not develop. D-1 land. Please choose Alternative A. Thank you for the opportunity to comment.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13334-1	Alyssa Wulf	Anvik Tribal Council	Most Alaska Native people are impacted by the BLM's land management planning decisions. BLM-managed lands support important subsistence resources and underpin food security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters. A tribal member from the village of Anvik on the lower Yukon River said it well, "We don't own the land, but we belong to the land and whatever happens to the land happens to	See response to comment 13139-1.	N

Subsistence					
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			us." The previous administration prepared five Public Land Orders (PLOs) without engaging Indigenous people, who are most impacted by the decisions, in the decision-making process. The flawed decision to advance the PLOs was also made without any consideration of how lifting the D-1 protections and allowing extractive resource development could negatively affect cultural use areas, fish and wildlife habitat, subsistence resources, hunting, fishing, and gathering rights, and food security for hundreds of communities.		
13340-3	Shannon Donahue	Rivers Without Borders	According to the Alaska Department of Fish and Game (ADFG), over 90% of Chilkat Valley residents participate in subsistence activities to feed their households. Opening the area's D1 lands to mineral development could threaten the community's access to subsistence grounds, exacerbating the ongoing loss of subsistence access on lands to the west due to the Palmer Project and road development. Mineral development on D1 lands could also threaten the clean water, berries, fish, and wildlife habitat that area residents depend on for subsistence and traditional cultural practices.	Effects to subsistence resulting from development are discussed in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13358-1	Theresa Clark		Lifting the D-1 protections and opening the lands to industrial development will undoubtedly affect fish and wildlife populations and the subsistence resources that so many Alaska Native communities depend on including those where many of our member tribe have lived since time immemorial.	Effects to subsistence resulting from development are discussed in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13358-2	Theresa Clark		Alaska's D-1 lands include large tracts of intact landscapes, watersheds, and river systems which support an abundance of biodiversity found in very few remaining places globally. It is the pristine, connectivity of these large systems that sustain salmon populations, an array of land mammals including caribou, moose, brown and black bear, and sheep and a vast number of migratory bird species. In turn, these systems also support the human communities that have utilized these special landscapes for millennia. Today, more than 100 Alaska Native communities still depend directly on access to BLM lands for subsistence hunting and fishing and for food security. Current trends include declining numbers in returning salmon species and caribou herds within the withdrawn lands.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13368-4	Lisa Ellanna	Kawerak, Inc.	There is currently multi-decadal, multi-species ongoing salmon collapse in the Norton Sound/Seward Peninsula region, and an unprecedented salmon collapse on the Yukon and Kuskokwim Rivers. Both salmon collapses make clear how critically important it is to maintain an intact ecosystem and the need for protective measures to provide subsistence opportunities.	Effects to subsistence resource abundance and availability of fish, including vulnerable populations, are described in EIS Section 3.14.2.2.2 and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13370-1	Ruth McHenry		Many of our wildlife populations are already in serious trouble. The Nelchina caribou herd, as you know, is so diminished that there have been no hunts--not even BLM subsistence hunts--this year. The Denali Highway region, which includes some d-1 lands, is important caribou habitat; the herd crosses it to and from the main calving grounds.	Section 3.14, Subsistence, was edited to address recent declines in the Nelchina Herd, and potential impacts to a loss of Federal subsistence priority in GMU 13. Edits to highlight the potential impacts to the Nelchina herd and associated harvests in GMU 13 were added throughout Section 3.14, including Section 3.14.1.2.4, Alternative C, Section 3.14.1.2.5, Alternative D, and the Loss of Federal Subsistence Priority and Increase in Lands Open to Development sections in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives, and in the Loss of Federal Subsistence Priority section in EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	Y
13379-2	Alex Whiting	Native Village of Kotzebue	While the Tribe has not yet taken a formal action supporting any one of the alternatives being considered under the DEIS, any of the action alternatives would decrease federal subsistence protections and management on those lands moving out of federal holdings and increase access to non-local hunters, with a subsequent increase in user conflict over wild game resources in these areas. While some of the lands at question may ultimately remain in federal stewardship, it's not clear at all which lands those would be. All of the action alternatives would also increase the likelihood of commercial development such as mining, or infrastructure like roads, which would impact the uses of these lands by our citizens for hunting, trapping, fishing, and camping, through both the activities themselves, and also through new land owners that may want to restrict certain uses, or access to these areas. The community of Kotzebue is directly adjacent to much of the lands subject to withdrawal in northwest Alaska and as such, are used frequently by our Tribal citizens.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13379-4	Alex Whiting	Native Village of Kotzebue	The Federal Subsistence Board currently has before it proposals to allow only federally-qualified subsistence users access to federal lands in northwest Alaska for the purpose of hunting caribou and moose in order to provide maximum opportunity to meet the unmet subsistence needs of people living in the area. If these (d)(1) lands are removed from federal management, then these additional subsistence protections would be removed along with them, if they are in fact implemented later this year.	Effects to subsistence resulting from a loss of Federal subsistence priority, including in the Kobuk-Seward Peninsula planning area, are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13398-1	Francis Mitchell	Tochak Historical Society	Historically, pre-historically and currently, the area is critical habitat for animal species upon which current and past residents have depended for sustenance. In addition, the headwaters of the Kuskokwim River are the spawning grounds for Chinook and other salmon species and,	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives.	N

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			consequently are vital to subsistence and commercial fishing along the entire length of the Kuskokwim.		
13398-2	Francis Mitchell	Tochak Historical Society	The historic records of local human life and livelihood dependence on the naturally evolved upper Kuskokwim ecosystem is abundant. Now there is also clear evidence of pre-contact dependence. In 2012, the skeletal remains of three humans were unearthed near the center of McGrath itself. DNA analysis determined that they were closely related and that they died approximately 400 years ago. DNA testing of the bones also revealed that the diet of these individuals, now called the Tochak Family, included primarily salmon and associated faunal remains, indicating a broad diet of wild food sources in the boreal forest ecosystem. The same wild food resources consumed today are essential to preserving the traditional use and values of Indigenous peoples of the area. The ANCSA (d)(1) withdrawals need to be retained for these reasons and purposes.	Subsistence uses of the 17(d)(1) withdrawal areas, including in the Bering Sea-Western Interior planning area, are described in EIS Sections 3.14.1.1.2, Subsistence Use Areas; EIS Section 3.14.1.1.3, Timing of Subsistence Activities; and EIS Section 3.14.2.1.1, Subsistence Harvests and Participation.	N
134-2	Martha Neuringer		Habitat and critical migratory routes for the largest remaining caribou herds, including the Western Arctic Caribou Herd, a species which is in decline due to loss of habitat. For this and other species, the connected habitat provided by these lands is essential to their survival. Again, this species provides an important food source for Native Tribes.	See response to comment 12889-1.	N
13445-1	Richard Slats		The lands managed by BLM, including those lands with D-1 protections, within the Yukon-Kuskokwim Delta have been important to our Tribes and communities for healthy and sustainable populations of fish, wildlife, and plant species. These resources are vital to our communities as subsistence and culturally significant resources, and the loss or adverse impacts to fish and wildlife habitat and subsistence resources would compromise our way of life and food security.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13467-1	Marisa Reynolds		For dozens of tribes the primary concern revolves around safeguarding subsistence resources. In an Oct. 9, 2023 letter to U.S. Secretary of Interior Deb Haaland, 78 tribes underscored the pivotal role of BLM-managed lands in sustaining essential subsistence resources. These lands serve as a primary source of sustenance for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples, constituting over 80% of the food consumed by Alaska Native communities residing off the road system. For many Alaska Natives gathering resources directly from the land is not just a choice but a way of life and a means of preserving cultural practices.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives	N
13484-1	John Sonin	Civilized Humanity	Expand the analysis of impacts on subsistence to include the Gwich'in people. The Gwich'in are dependent on the Porcupine Caribou Herd, a dependence that is well documented and foundational to their ability to exist as they are. The study is short sighted and ignores the significant impacts to the Gwich'in.	EIS Section 3.14, Subsistence, addresses all communities located within 50 miles of any 17(d)(1) withdrawal areas. 17(d)(1) withdrawals do not overlap with the range of the Porcupine Caribou Herd and therefore impacts are unlikely.	N
13563-1	Aakatchaq Schaeffer		A majority of my extended family continues to live along the coast in Kotzebue, as well as 28 miles northeast above the Kobuk river at our Native allotment called Ivik. As well as my parents land that is located 8 miles along the coast southwest of Kotzebue along the shore just past Sadie Creek. We rely on these animals along this land and along all the waterways spanning far beyond the immediate area surrounding Kotzebue. Sometimes we travel a full day or longer to reach an area for hunting and gathering purposes. In my 49 years, my family has often traded our different Native food within communities in our region. We also trade with distant communities as far as Utkiagvik (the northernmost Native community in Alaska) and as far south as St Paul Island on the Aleutian chain. This is our life. This is how we continue to survive here in our arctic community.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives. Impacts to sharing networks are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
13564-1	Roswell Schaeffer		A majority of my extended family continues to live along the coast in Kotzebue, as well as 28 miles northeast above the Kobuk River at our Native allotment called Ivik. As well as on our land that is located 8 miles along the coast southwest of Kotzebue along the shore just past Sadie Creek. This is where we spend our spring and summers where we process our oogruk meat and oil in the springtime. As well as dry our salmon in the summer months. We rely on these animals along this land and along all the waterways spanning far beyond the immediate area surrounding Kotzebue. Sometimes we travel a full day or longer to reach an area for hunting and gathering purposes. In my 76 years, my family has often traded our different Native food within several communities in our region. We also trade with distant communities as far as Utkiagvik (the northernmost Native community in Alaska) and as far south as St Paul Island on the Aleutian chain. This is our life. This is how we continue to survive here in our arctic community.	See response to comment 13563-1.	N
13566-1	Mildred Schaeffer		A majority of our extended family continues to live along the coast in Kotzebue, as well as 28 miles northeast above the Kobuk river at our Native allotment called Ivik. As well as my land that my husband and I own is located 8 miles along the coast southwest of Kotzebue along the shore just past Sadie Creek. We rely on these animals along this land and along all the waterways spanning far beyond the immediate area surrounding Kotzebue. Sometimes we travel a full day or longer to reach an area	See response to comment 13563-1.	N

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			for hunting and gathering purposes. In my 73 years, my family has often traded our different Native food within communities in our region. We also trade with distant communities as far as Utkiagvik (the northernmost Native community in Alaska) and as far south as St Paul Island on the Aleutian chain. This is our life. This is how we continue to survive here in our arctic community.		
13586-2	Arnold Demoski	Nulato Tribal Council	BLM managed lands support important subsistence resources and underpin food security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13600-15	Jen Leahy	Theodore Roosevelt Conservation Partnership	The TRCP appreciates the obvious attention the BLM dedicated to analyzing subsistence impacts in the draft EIS. To accurately capture the direct, indirect, and cumulative impacts of revoking the D-1 withdrawals to subsistence communities in the final EIS, the BLM will need to update the subsistence impacts based on a more realistic Reasonably Foreseeable Development Scenario as described above.	See response to comment 13600-2. No changes will be made to the 31-mile RFD scenario assumption. Therefore, the subsistence analysis is appropriate to disclose impacts.	N
13600-16	Jen Leahy	Theodore Roosevelt Conservation Partnership	In discussing Alternative B (partial revocation of the D-1 withdrawals), it is unclear why the number of acres expected to lose the federal subsistence priority (50,375 acres) is larger than the number of acres the BLM expects would be conveyed to the State of Alaska (44,000 acres). This discrepancy should be resolved in the final EIS. There are also discrepancies between the number of communities with subsistence use areas that overlap with the decision area.	The text referred to does not occur in the EIS. Areas likely to lose Federal subsistence priority are those State top filed lands of any priority (Priority 1, 2, 3, and 4). EIS Section 3.14, Subsistence, assumes that the State would only convey Priority 1 and 2 lands, and that Priority 3 and 4 lands would eventually be relinquished and returned to Federal management.	N
13614-3	Sam Masters	Protect Our Winters	For Alaska Native communities relying on subsistence fishing and hunting, D-1 lands are indispensable for food security and maintaining a way of life that has endured for millennia. The threat of oil and gas leases directly challenges their sustainable practices and cultural heritage.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13625-2	Suzanne Little	The Pew Charitable Trusts	<p>Ensuring food security for people intrinsically connected to BLM lands is the most compelling reason to retain the D-1 protections. Today, more than 100 Alaska Native communities depend directly on access to these BLM lands under review for subsistence hunting, fishing, and gathering; crucial elements supporting food security. D-1 lands analyzed in this DEIS, which include 28 million acres of largely contiguous, ecologically intact habitat, support an abundance of globally significant biodiversity. These large landscapes include habitat that sustains critical salmon populations and an array of land mammals including caribou, moose, brown and black bear, and sheep, along with a vast number of migratory bird species.</p> <p>All of these resources, among others, support the subsistence economy and culture of Tribal communities in Alaska. The ability of BLM lands to sustain these economic, cultural, and ecological connections between land and people relies primarily on the retention of D-1 protections, which would preclude these lands from being transferred out of public ownership for the purposes of development. Considering the disproportionate impacts of climate change on Alaska's natural and human communities, including the salmon crash on the Yukon and Kuskokwim Rivers and the significant decline of caribou herds, it is in the public interest to adopt a precautionary approach that prioritizes the protection of subsistence resources and peoples' food security. A decision to lift D-1 protections in the midst of food resource decline would lead to additional adverse impacts across ecological and human communities.</p> <p>Many Alaska Tribes, Tribal consortia organizations, and federal advisory boards in Alaska have recently sent letters to the BLM supporting retention of all D-1 protections as proposed by Alternative A. On October 19, 2023, seventy-eight Alaska Tribes signed a letter to Secretary Haaland asking for all the D-1 protections to be retained across the five planning areas. And, significantly, on January 23, 2024, a letter signed by executives of three large regional tribal consortia from the Yukon and Kuskokwim River regions - Association of Village Council Presidents (56 Alaska Tribes); Kawerak (20 Alaska Tribes); and the Tanana Chiefs Conference (46 Alaska Tribes) - was submitted requesting that the Secretary of the Interior retain all D-1 protections. Given the importance of retaining D-1 lands in their natural state and the strongly united perspective shared by the communities affected most by the decision, we urge the BLM to adopt Alternative A, the No Action Alternative, thereby maintaining existing D-1 protections.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
1374-1	Joan Dubis		Opening up these lands to industrial development like mining or oil drilling would harm intact ecosystems, threaten fish and wildlife and further exacerbate food security and cultural concerns for Alaska Native people and others living in remote Alaska communities.	Effects to subsistence resulting from development are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
13743-2	Christopher Lish		The Alaskan Arctic is experiencing melting permafrost, coastal erosion displacing communities, increasing air and water temperatures, and habitat fragmentation and displacement of fish and wildlife populations. In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also undoubtedly create more stress on fish and wildlife	Existing effects on subsistence, including impacts from climate change, are described in EIS Section 3.14.1.1.4, EIS Section 3.14.2.1.2, and EIS Section 3.14.3.1.1, Existing Conditions.	N

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			populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.		
13762-1	Julia Smith	Wild Salmon Center	Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds, and impact important salmon streams that nourish entire watersheds. In a region experiencing rapid ecological fluctuations due to climate change, opening the D-1 lands will also undoubtedly create more stress on fish and wildlife populations and jeopardize the ability of these natural systems to support vital subsistence resources and Alaska Native communities.	Effects to subsistence access, resource availability, and resource abundance resulting from increased development are described in EIS Section 3.14, Subsistence. Cumulative effects on subsistence are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
13790-1	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	The 17(d)(1) designation plays a pivotal role in protecting fish and wildlife, an integral part of traditional subsistence hunting, fishing, and gathering that are fundamental to protecting Alaska Tribal ways of life. The removal of any of these lands from federal 17(d)(1) designation would result in the loss of ANILCA Title VIII protections and reduce federal lands available for subsistence priority hunting and fishing for federally qualified users. Removing this designation could lead to unrestricted access, exploitation, and extraction of resources on these lands. Thereby, endangering the sustainability of vital fish and wildlife resources that not only our Tribes but also our neighboring communities depend on for their survival.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13795-1	Denis Ransy		As a Talkeetna-area resident, I know that we are struggling with growth problems. The lack of police protection is a big problem. We are losing some of the very qualities that are important to our lives. Without D1 protections, subsistence resources are negatively impacted. The land and waters are our grocery store. Every family benefits from hunting, fishing, wild berries, plants, and other resources. The communities up here in this area worked hard on many government plans the last 40 years to protect our resources from unwanted development. For example, the Talkeetna Comprehensive Plan Advisory Committee was made up of area residents appointed by the Mat Su Borough. The borough plan decided on the following goals: Protect and preserve the wilderness values and natural resources of the lands surrounding Talkeetna. Maintain the community's small-town atmosphere, sense of community, and high quality of life. Maintain Talkeetna's major recreation and ecologically sound tourism economy and avoid conflicting activities. The DEIS estimate of 7541 acres of potential development within the 3 areas if D1 protections are lost is very scary. To lose 199,338 acres of federal subsistence priority is scary.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
13851-6	Margaret Stern	Susitna River Coalition	While there are many designated lands in the obviously wild regions of our watershed, there are also implications for lands closer to population centers. IN the Ring of Fire planning area, there are potential lands slated for withdrawal around Talkeetna, Talkeetna Spur Road, Chase, and Trapper Creek areas. Wild spaces providing access to hunting, fishing, and other subsistence and recreation activities are integral to the lifestyles, well being, and economies of these frontier communities. Without these d-1 protections these federal lands would totally change the social, cultural, recreational, trail management systems, and subsistence access, ability and availability.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence. Cumulative impacts on subsistence are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
13870-5	Megan Condon	Bering Sea-Interior Tribal Commission	Subsistence Resources and Alaska National Interest Lands Conservation Act Section 810 Evaluation Lands subject to d-1 withdrawals in the Bering Sea-Western Interior planning area contain important subsistence resources and use areas. Lifting d-1 withdrawals could fragment habitat and decrease access to subsistence resources. Ongoing salmon collapses in the Norton Sound/Seward Peninsula region, and an unprecedented salmon collapse on the Yukon and Kuskokwim Rivers in recent years, have demonstrated the importance of intact ecosystems and the need for protective measures to provide subsistence opportunities. The Bureau identified the failure to adequately analyze potential impacts on subsistence hunting and fishing as one of the legal defects in the decision-making process for public land orders lifting d-1 withdrawals. In the Draft EIS, the Bureau recognized the fundamental importance of subsistence for both food security and rural communities cultural, economic, and social wellbeing. The Bureau identified two primary ways that revoking the d-1 withdrawals could impact subsistence: loss of federal subsistence priority and increase in land open to development. Because of limited information and assumptions in the Bureaus reasonably foreseeable development scenario, the Draft EIS underestimates potential impacts to subsistence resources and uses. For example, the reasonably foreseeable development scenario assumes areas with potential for locatable mineral extraction would occur within 1 mile of existing State or Federal mining claims. Thus, the Bureau only considered an area more likely to be developed if it is within 1 mile of existing mining claims. This assumption severely restricts the area considered more likely to be developed and the Bureau provided no clear rationale for this assumption. Because the Bureau's analysis of impacts is largely based on the overlap between subsistence use areas and areas that would lose federal subsistence priority or areas more likely to be developed, the agency's narrow definition of areas more likely to be developed downplays potential impacts. Potential impacts from lifting d-1 withdrawals would also	See response to comment 13628-23. EIS Sections 3.14.2.2.4 and 3.14.2.2.5 (Alternative C and Alternative D, respectively) were edited to include text about broader indirect impacts that could occur for communities outside the vicinity 17(d)(1) withdrawals area if there are changes in resource abundance for migratory resources.	Y

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			intensify the ongoing effects to subsistence resulting from climate change. Changes in habitat, shifts in migration patterns, and increases in extreme weather events are just a few of the climate change related effects we are currently experiencing. In the Draft EIS, the Bureau recognized that the potential impacts of lifting the d-1 withdrawals could compound similar negative impacts to subsistence related to climate change. These changes further demonstrate the need to protect the landscapes and large intact ecosystems that sustain our subsistence-based ways of life.		
13882-1	Michelle Meyer	Yakutat Tlingit Tribe	Alaska's D-1 lands include large tracts of intact landscapes, watersheds, and river systems which support an abundance of biodiversity found in very few remaining places globally. It is the pristine condition of these large systems that sustain salmon populations, an array of land mammals including caribou, moose, brown and black bear, and sheep and a vast number of migratory bird species. Our people are supported by the rich diversity of the land during the millennia we have lived on them. Today, our community still depends directly on access to BLM lands for subsistence hunting and fishing and for food security.	See response to comment 13358-2.	N
13890-1	Bill Kane	Igiugig Village Igiugig Village Council Igiugig Native Corporation	As identified in recent comments regarding proposed mineral development activities near the headwaters of Kaskanak Creek (enclosed), BLM lands within the decision area include areas of critical importance to Igiugig Villages stewardship and living practices. For example, tracts within the Iliamna West Planning Region (Figure 2) include important moose and caribou habitats that support critical periods of their life histories including calving. Calving areas for the Mulchatna caribou herd are of acute importance right now because their population is low enough that subsistence users from Igiugig have not been allowed to hunt that herd for three years now. Bolstering the numbers in that herd is a principal concern for Igiugig residents because, without the ability to hunt that herd, residents have no viable options for traditional caribou harvest. Further, both the Iliamna West and Kvichak planning blocks overlap with BLMs designated Igiugig Subsistence Use Area (Figure 5), and both include stream corridors which contribute to the habitat complexity, diversity, and abundance that sustain the world's last thriving wild sockeye salmon fishery and stronghold (Rinella, Shaftel, and Athons 2018). Suffice it to say, Igiugig residents depend upon these regions for food security.	Effects to subsistence resource abundance and availability, including for caribou and salmon, are described in EIS Section 3.14.2.2.2 and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. EIS Section 3.14, Subsistence, was edited to incorporate additional information regarding recent declines in the Mulchatna caribou herd and associated hunting closures.	Y
13901-1	Anonymous		With a growing human population and energy use, along with technological proliferation and a transition to more electric power, I perceive no end to increased demand for natural resources. If development of non-renewable resources (minerals, oil and gas) were to degrade d-1 lands and waters to the degree of lowering the carrying capacity of the habitat for fish and wildlife used for food, the reduction in sustainable yield to humans would have to be offset with local agriculture, mariculture, or livestock husbandry, or through imported foods at high cost and fossil fuel input. This would be particularly harmful to residents of affected remote areas off the continental road system in Alaska because it would displace subsistence uses, thus requiring more burning of fossil fuels to travel to areas further away and likely increasing conflicts over wild food stocks with existing subsistence users elsewhere.	Effects to subsistence, including increased time and effort spent procuring subsistence foods and increased competition for subsistence foods, are described in EIS Section 3.14, Subsistence.	N
13933-3	Anonymous		The EIS should include an analysis of the effects the current levels of warming have had on each section of lands which might be withdrawn from the 17 (d)(1) protection, so that there can be a reasonable consideration of what future climate change due to possible development might do to future resource harvests. Future development possibility and its effects on subsistence resources, cultural traditions, mental and physical health, and cultural resources needs to be analyzed for ALL of the lands subject to possible withdrawal from protection. Providing alternative sources of protein to make up for missing subsistence resources alters the social patterns of the local communities, is at best a stop gap measure, and consideration of these as mitigation measures is culturally insensitive and inappropriate. Additionally, the possible conveyance of these lands out of federal status, as noted, could have severe consequences on the subsistence classifications and harvest availability of the local peoples.	Existing effects on subsistence, including impacts from climate change, are described in EIS Section 3.14.1.1.4, EIS Section 3.14.2.1.2, and EIS Section 3.14.3.1.1, Existing Conditions, and future effects of climate change are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
13946-2	Benjamin Freitas	World Wildlife Fund	Alaska's D-1 lands include important conservation areas and large tracts of intact landscapes, rivers, and watersheds that support fish and wildlife habitat as well as providing vital subsistence resources for local and indigenous communities. Lifting the D-1 protections could negatively affect vulnerable wildlife and ecosystems, as well as the cultural use of the lands, and jeopardize the food security for hundreds of communities.	See response to comment 13358-2.	N
13957-3	-	Western Colorado University on Behalf of Students	The flawed decision to advance and lift the protections was made without consideration of how allowing extractive resource development could negatively affect subsistence resources, cultural use areas, hunting, fishing, and gathering rights, and food security for 139 impacted native communities. While this draft EIS has incorporated further consideration for disproportionately impacted communities, we do not believe public scoping has brought to attention the potential	EIS Section 3.14.1.2.7, Cumulative Impacts, was edited to more thoroughly address potential psychological, cultural, and social impacts associated with a loss of subsistence opportunities.	Y

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			<p>cumulative effects of climate change and socio-cultural dynamics such as mental health. These concerns were briefly addressed in sections 3.6.1.2.7 and 3.14.1.2.7 of the draft EIS, though no detail was given on the extent to which cumulative impacts of climate change may further detriment the livelihood of adversely impacted subsistence communities.</p> <p>Prioritizing the retention of subsistence opportunities is critical for sustaining cultural identity and traditional ways of life, and protecting the physical and mental health of disproportionately impacted communities (Ready, 2019). These communities are particularly vulnerable to rapid socio-cultural changes that have the potential to be a barrier to community adaptation including food security and sovereignty under a changing climate (Herman-Mercer et al. 2019). Climate change is predicted to have a disproportionate impact on subsistence-oriented communities due to a reduction in the availability of subsistence resources, such as wild and domestic plants and animals, which will threaten the traditional way of life for many indigenous groups (Brinkman et al. 2016; Savo et al. 2016).</p>		
13984-2	Chief Gary Harrison	Chickaloon Native Village	<p>Indigenous peoples have relied on the land for traditional livelihoods such as hunting, fishing, and gathering. The potential development or conveyance of lands following withdrawal revocation could disrupt these activities, jeopardizing Indigenous food security and economic well-being. Uncertainty about the future of these lands can undermine Indigenous peoples' ability to plan.</p>	<p>Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.</p>	N
13993-2	Shoren Brown, Rebecca Gillis	The Conservation Alliance, Outdoor Alliance, Outdoor Industry Association; The Conservation Alliance, Outdoor Alliance, Outdoor Industry Association	<p>BLM lands under D-1 protections in Alaska are also some of the last wild landscapes yet to be afforded lasting protections for cultural, historical, recreational, biological, and intrinsic natural values. Nearly 100 federally recognized Tribes in Alaska are impacted by BLM's land management planning decisions. BLM managed lands serve as the food security to thousands of Indigenous Alaskans, including Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik and Tlingit peoples whose average annual subsistence harvest provides 18,000 tons of wild food. "All of the planning areas are inhabited by rural and Alaska Native residents who rely heavily on subsistence hunting, fishing, and harvesting. Subsistence is a central aspect of rural life and culture and is the cornerstone of the traditional relationship of the indigenous people with their environment. Residents of the five planning areas rely on subsistence harvests of plant and animal resources both for nutrition and for their cultural, economic, and social wellbeing."</p> <p>On these lands, the D-1 protections central to the DEIS have created de-facto protections for these resources from large-scale extractive development that would jeopardize the health and sustainability of the fish, wildlife, and Indigenous people of these lands.</p>	<p>Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.</p>	N
14004-2	Sarah Hoepfner	Alaska Shorebird Group	<p>In addition, shorebird species and other bird species comprise an important food source for Native Alaskans who live within the withdrawal area; harvesting shorebird adults during spring and fall and collecting eggs in the spring and summer (Naves et al. 2019). These harvests help provide diet variety, food security, and are culturally valuable. The people living in the withdrawal areas, and throughout the state, rely on birds breeding and migrating throughout the 17(d)(1) withdrawal areas as a source of food and cultural identity (Fienup-Riordan 2000).</p>	<p>Subsistence uses and harvests of the study communities, including subsistence uses of birds, are described in EIS Section 3.14.2.1.1, Subsistence Harvest and Participation, and in EIS Appendix G, Subsistence Technical Appendix.</p>	N
14006-1	Daniel Cheyette	Bristol Bay Native Corporation	<p>BBNC is concerned about impacts to the federal subsistence priority under all proposed alternatives. BBNC does not support the loss of the federal subsistence priority on appreciable acreages of lands due to such lands becoming effective state selections through the revocation of the 17(d)(1) withdrawals. For the Bay planning area, Alternatives C and D would result in the federal subsistence priority being lost on at least 4,000 acres. While Alternative B would result in fewer acres lost, the draft EIS makes unverifiable assumptions about whether or not State top-filings will become effective selections upon revocation of the 17(d)(1) withdrawals. Such unverifiable assumptions may lead to greater impacts on the federal subsistence priority than disclosed in the draft EIS under all action alternatives. The subsistence priority on federal lands throughout the Bristol Bay Fisheries Reserve is integral to the way of life for those in Bristol Bay. Bristol Bay's streams, wetlands, and other aquatic resources support a more than 4,000-year-old subsistence-based way of life for Alaska Natives. Bristol Bay communities are self-reliant, operating without the benefit of interconnected road and utility systems, and subsistence use of wild resources is the most consistent and reliable component of the local economy. In addition to salmon, important subsistence foods for the region include caribou, moose, waterfowl, and berries. Subsistence activities throughout the Reserve play a major role in defining Alaska Native families and communities through the passing on of knowledge and traditions from one generation to the next and the reinforcement of Native values, such as generosity, respect for Elders, self-esteem, and cultural respect. Moreover, studies have shown that the vast majority of households in the region rely on subsistence fishing, hunting, and gathering for a large percentage of their food. Recent analysis from other federal agencies, namely the Environmental Protection Agency and U.S. Army Corps of Engineers, have provided robust data and analysis to support the conclusion that subsistence plays a strong role throughout the Reserve. This robust information has helped</p>	<p>EIS Section 3.14, Subsistence, incorporated available subsistence harvest, subsistence use area, and seasonal round data for all study communities, which are described in further detail in EIS Appendix G, Subsistence Technical Appendix.</p> <p>As described in EIS Section 3.1, Introduction and Methodology, by law, when lands are no longer encumbered, top filings become effective selections. The BLM used public land records (available in the Public Room at BLM offices or online at https://sdms.ak.blm.gov/sdms/) to determine if State top filings in the decision area occur on lands with additional encumbrances that would prevent those top filings from becoming effective selections. If there are no other encumbrances on the land, if the 17(d)(1) withdrawals were revoked, by law the top filings would become effective selections. See response to comment 14414-12 regarding assumptions about top filing priorities and how they may be conveyed.</p>	N

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			those agencies support decisions preventing large-scale hard rock mining at the Pebble deposit. Likewise, BLM should look to the robust subsistence data and information in those agencies' analysis to help inform its analysis of the impacts to the people of Bristol Bay from the loss of the federal subsistence priority, as well as the impacts from opening federal lands to mineral entry. Overall, BBNC does not support any action alternative that would significantly diminish the acreage in Bristol Bay that is subject to the federal subsistence priority.		
14013-2	Roberta Highland	Kachemak Bay Conservation Society	With over 95% of the food found in Alaskan grocery store shelves coming from out-of-state, many people rely heavily upon wild-caught subsistence foods to offset the high cost. This is especially the case in rural Alaska. Industrial mining and oil and gas development have a legacy of leaving toxic spills, habitat destruction, and broken wildlife corridors in their wake that despoil wild, subsistence resources. https://www.climatehubs.usda.gov/hubs/northwest/topic/food-security-and-justice-calypto-farm-alaska	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence	N
14056-1	Theresa Kobuk, Gilbert Tocktoo, Dolly Kugzruk, Doug Katchatag, Axel Jackson	Native Village of St. Michael Tribal Council; Native Village of Brevig Mission Traditional Council; Native Village of Teller Traditional Council; Norton Bay Watershed Council; Native Village of Shaktoolik Tribal Council	Tribal communities located or having subsistence interests in the Norton Bay Watershed are impacted by the BLM's land management planning decisions related to the Bering Sea Western Interior (BSWI) and Kobuck-Seward (KS) planning areas. BLM-managed lands support the subsistence based economies of these local communities. According to NBWC board member Frances Degnan, Indigenous way of life is based on ancient oral traditions about place, community, and inherent sovereignty of the land, explaining. She says "Our lifeways are guided by these values and practices to continue our habitation in the place the Creator set us to live harmoniously as stewards of his earth to continue clean land, waters, and air so all his creation continues. That is our traditional knowledge." Under the Alaska Native Claims Settlement Act (ANCSA), the Secretary of the Interior must evaluate whether D-1 protections should remain in place to protect the public interest,1 and it is in the public interest to protect the Inupiat and Yup'ik, peoples way of life who are located in BSWI and KS planning areas.	Effects to subsistence resulting from development and a loss of Federal subsistence priority, including for the Bering Sea-Western Interior and Kobuk-Seward Peninsula planning areas, are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14167-1	Olivia Karns	Tanana Chiefs Conference	In specific reference to the forthcoming ANCSA (d)(1) land decision, the BLM needs to take into account the sustainability of villages and the continuation of the Alaska Native way-of-life. The health of the ecosystems that support wild food economies among Alaska Native peoples needs to be center-stage in rendering recommendations in the preferred alternative in the ANCSA (d)(1) EIS process.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14167-3	Olivia Karns	Tanana Chiefs Conference	The current situation across most, if not all, of the ANCSA (d)(1) lands area is a prominent condition of resource depletion that has already stressed the wild food economies of many rural communities in the five affected planning areas. Across the landscapes of the five planning areas, natural habitat is largely unfragmented across forested, riverine and tundra ecozones. Revoking the protective ANCSA (d)(1) withdrawals would certainly contribute to fragmentation of the intact landscapes and further compromise the integrity of natural ecosystems that support wild food resources. The most prominent condition in the riverine environs across the region is the catastrophically low frequency of returning Pacific salmon taxa throughout the Yukon and Kuskokwim River basins. Given the current condition of renewable resources on public lands in Alaska, the BLM needs to develop <i>habitat management plans</i> using contemporary <i>planning criteria</i> involving <i>Indigenous knowledge</i> of the boreal forest ecosystem. Circumstances leading to the current poor health of the environs in question are drawn from competition for those resources (i.e., commercial overharvesting for decades) and, more recently, a consequence of global warming. Removing ANCSA (d)(1) PLOs for transfer of lands to the State of Alaska would exasperate the problem given that the State of Alaska has managed lands over decades under the false assumption of maximum yield practices. Among Tribal leadership of rural villages, the maximum yield management scheme pushed by the State of Alaska has directly contributed to vastly diminished wild food resources. The most prudent action on ANCSA (d)(1) lands is to retain these protection measures and provide an opportunity for the renewable resources to rebound. The excesses of commercial harvesting and climate change forcings have led to <i>entire restrictions</i> on subsistence harvests among rural villages located in the riparian zone of the major rivers.	Effects to subsistence resulting from a loss of Federal subsistence priority and change to State management are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14167-8	Olivia Karns	Tanana Chiefs Conference	The hearings on ANCSA (d)(1) lands has included comments from Tribal leadership of the TCC region and all have endorsed the <i>no action</i> alternative. Among TCC tribal leaders and members, thus far in public commentary on the ANCSA (d)(1) lands, there is universal support for the <i>no action</i> alternative. At the in-person Fairbanks hearing, a young Tribal leader from the village of Dot Lake commented about how the lifting of PLO 7903 would affect subsistence priority in the Ahna region where his family has a Native allotment. Several Alaska Native attendees commented about how the land is already under stress from user conflicts, the salmon crisis and climate change effects that justify retaining the ANCSA (d)(1) PLOs for conservation purposes. Conservation approaches would support wild food economies and contribute to preserving the	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development, including in the Bering Sea-Western Interior planning area, are described in EIS Section 3.14, Subsistence.	N

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			Alaska Native way-of-life. One of TCCs professional resources staff testified that the rather than revoking PLOs, the BLM would be better stewards of the land and be more sympathetic with the <i>sustained yield</i> management paradigm to retain ANCSA (d)(1) PLOs and implement an intensive environmental monitoring program with affected rural communities. The BLM already has a robust set of long term monitoring procedures in its AIM program (Assessment, Inventory and Monitoring regime). An intensive monitoring program would inform the agency in the future on rendering wise decision-making over land and resources that support small rural communities reliant on wild food resources. During the telephonic hearing for Yukon River communities, three Tribal leaders spoke on how the revocation of the PLOs would negatively affect their wild food economies. Chief Robert Walker from the village of Anvik in the lower Yukon River region testified about the salmon crisis and the need for preserving the spawning grounds for salmon on ANCSA (d)(1) lands. He also brought up a question of how the State of Alaska would manage those lands if the PLOs were revoked. Based on previous experiences, he asserted that the State of Alaska would open lands and create user conflicts with local community members. Chief Walker's perspective emphasized how the salmon are systematically disappearing from the rivers in western Alaska and is highly concerning because people living in villages no longer have salmon for basic food security. Michael Stickman of Nulato is an executive board member of the BSITC and former Chief of that Tribes. He asserted his view about keeping the lands as they are by retaining the ANCSA (d)(1) PLOs. He referenced the salmon population crisis by acknowledging that there has been no fishing for the past four years and opening the land to other uses would make it harder for the people who live in the area and rely on wild food sources supported by intact habitats across ANCSA (d)(1) lands. His comments went further to attribute the salmon crisis to the effects of climate change, a major theme for supplemental environmental analysis on the repercussions of the ANCSA (d)(1) decision-making process. Mr. Stickman also commented about the categorical denial of all Tribal nominated ACECs in the Bering Sea Western Interior RMP. He expressed concern that his village of Nulato has not been mentioned in the environmental review regarding their ACEC nomination of the Nulato River, a high value watershed that provides wild food and fresh drinking water for the community. A third tribal leader of the lower Yukon River region who testified in the teleconference is Chief Eugene Paul of Holy Cross. His village is surrounded by large tracts of ANCSA (d)(1) lands and he asserted that opening the lands by revoking PLOs would be devastating to his community. That area already suffers from heavy competition for wild food resources because of non-local, commercial users under the multiple-use paradigm of the BLM. Chief Paul attributed the traditional activities of berry picking, along with ceremonial fishing and gathering as sacred to the way-of-life in the village. The harvesting of wild foods allows residents to provide for themselves and to pass on that way-of-life from generation to generation. His perception is that revocation of the PLOs on ANCSA (d)(1) lands would impact families in his community for a lifetime. Chief Paul is overtly supportive of the <i>no action</i> alternative to conserve the intact landscapes around Holy Cross and allow renewable fish and game resources an opportunity to rebound for the interest of sustaining the citizens of the Native Village of Holy Cross.		
14190-1	Jasmine Jemewouk	Alaska Community Action on Toxics	Freezers full of caribou, salmon, and plants they harvest over the seasons are essential to survival. The loss of subsistence priority will be detrimental for Alaska Native families all over the state. The Indigenous peoples of Alaska have thrived here for thousands of years, relying on seasonal plants and migratory animals that use these habitats for breeding, overwintering, or resting. Traditional food is the healthiest diet we can possibly consume. We are concerned about threats to food security in rural communities where families heavily rely on subsistence food.	Effects to subsistence resulting from a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14242-1	Stacey Glaser		I've lived nearly forty years in Arctic Alaska, along the Noatak and Kobuk Rivers, subsisting off food, furs, berries, firewood, moss, and many other things from this land and these waters. The majority of this has been in the form of caribou, salmon, cranberries, spruce, and small furbearers, and wide open intact spectacular wilderness, if you need know, but I've also lived on bear meat, whitefish and geese and shorebirds, and countless other species all of which very much require unpolluted, undeveloped habitat to survive themselves. This is especially true of caribou, salmon, and grizzly bears and other creatures which need unfragmented habitat. Unfortunately, if you look at the Lower-48 and Europe and other areas of the world you can see exactly what happens to species that require large lands and have had them chopped up and destroyed. I and my family, relatives, and friends, and communities continue to provide food for ourselves and others from this land all of which is in line to be turned over to oil and gas and mineral extraction, plowed and cut into pieces, polluted, if you lift vital D1 protections. This is not a maybe. This is reality. This decision, if you decide to discard these protections, would destroy our way of life here in Alaska.	Effects to subsistence resulting from development are discussed in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives.	N
14345-1	Beth Cender, Jeff Yarman		With the changing climate affecting habitat and feed sources many animals will need a more expansive area to sustain themselves. If roads are built, at some point more development will come as people move in to take advantage of the more easily accessible natural resources and economic benefits a road brings. If we divide these large areas of wilderness with roads, mines, oil	Effects to subsistence resulting from increased development are discussed in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives.	N

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			and gas infrastructure, and other development we will increase the stress for wildlife populations to migrate, find food and reproduce. This will also impact the lifestyle of many Alaskans who are in rural areas. It will impact all Alaskans whether they hunt for subsistence or just to help fill their freezer or just want to be in a setting that lacks the imprint of constantly chaotic civilization.		
14374-1	Natalie Dawson		Most of the BLM lands within the Haines Amendment are D1 withdrawals under question in the draft EIS. These lands are important subsistence and recreation lands for all residents in the Chilkat Valley. Most of these lands are also state of Alaska priority 1 and priority 2 selections, and if D1 withdrawals are removed, over 80% of the subsistence and recreation lands within the Chilkat Valley could be filed for state of Alaska selection, removing federal subsistence provisions with no public input.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority, including communities in the Chilkat Valley, and increased development are described in EIS Section 3.14, Subsistence.	N
14375-3	Jamie Dittmar		Moreover, it's essential to consider the impact of land withdrawals on Indigenous food sovereignty. Indigenous communities often rely on these lands for traditional hunting, fishing, and gathering practices, which are integral to their cultural identity and food systems. Any disruption to these practices due to land withdrawals would not only infringe upon Indigenous rights but also threaten their food security and sovereignty.	Effects to subsistence resulting from development are discussed in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives.	N
14378-2	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	The lands that are called "D1" lands in the Chilkat Valley are important places for food gathering and traditional activities. We rely on healthy wild stock salmon populations within the Chilkat River watershed, which has all five species of Pacific salmon and is one of the most important rivers for healthy salmon populations in Southeast Alaska. The tributary spawning streams for salmon include Glacier Creek, Porcupine Creek, the Tsirku River, the Chilkat River, and the Ferebee River. Each of these creeks and rivers, and many others, run through D1 lands. If D1 withdrawals are lifted, our Tribal government will not be able to enter into agreements with the US government agencies managing these lands at a time when we are requesting consultation and coordination to build co-stewardship of our lands and waters.	The Increase in Lands Open to Development section in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives, was edited to incorporate information regarding subsistence uses of 17(d)(1) lands in the Chilkat Valley. If Federal lands are conveyed to the State, Tribes would not have the opportunity for co-stewardship with Federal agencies on those lands. Loss of co-stewardship was added to Table 1.6-2, Issues Identified but Eliminated from Detailed Analysis, with rationale for why.	Y
14414-10	Sarah Obed	Doyon, Limited	The EIS's discussion of potential subsistence impacts associated with revocation of the 17(d)(1) withdrawals fails to fully and clearly address subsistence use of ANCSA lands. The DEIS states: "On Federal public lands, rural residents typically have a subsistence priority (see Section 3.14.1.1.1, Subsistence Management) and, under ANILCA, reasonable subsistence access is guaranteed. The exception is lands that are either State or ANCSA selected. On these lands, subsistence is managed by the State and will remain managed by the State unless the selections are relinquished. Conveyance of lands out of Federal ownership results in loss of Federal subsistence priority. All State and private lands in Alaska are managed by the State and do not provide for a rural residence subsistence priority." DEIS, p. 3-169. This discussion, however, omits any discussion of the fact that ANCs like Doyon manage their private lands for the benefit of their shareholders, including specifically for subsistence use.	EIS Section 3.14.1.1.1, Subsistence Management, was edited to incorporate discussion about ANC management of lands for shareholders.	Y
14433-1	Frank Keim	Alaska Wilderness League	disruption of the natural wildlife cycle on these lands would further compromise what's left of the traditional Inupiat way of life by severely changing their subsistence hunting, fishing and gathering patterns.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14462-3	Geoffrey Parker	Bristol Bay Fishermen's Association	Third, because most of the public land in the Kvichak and Nushagak drainages is state public land, the state subsistence priority, rather than the federal subsistence priority, applies. That leaves rural subsistence users less protected and justifies a greater effort by the federal government to assist in conserving non-federal lands in the Kvichak and Nushagak drainages.	The Loss of Federal Subsistence Priority section in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives, was edited to clarify that some regions have fewer lands with Federal subsistence priority to begin with and therefore may be particularly vulnerable to a loss of Federal lands.	Y
14563-9	Michael Spindler		Table ES-1, p. ES-13 tries to indicate how subsistence resource abundance and availability could be changed by the action alternatives but only a simple non-meaningful answer is provided "see harvester access." That circles the reader back to your good job of defining how the D1 revocations will impede access to lands where subsistence occurs, but it does not address abundance and availability.	The primary metrics for measuring which communities are more likely to experience impacts on harvester access, resource abundance, and resource availability are the same and include use area overlap and proximity to affected lands. Additional measures and discussion regarding impacts to resource abundance are provided in Section 3.14.2.2, Environmental Consequences, Resource Abundance, and Section 3.14.3.2, Environmental Consequences, Resource Availability.	N
14563-10	Michael Spindler		The text in Section 3.14 alludes to how the action alternatives and cumulative impacts could affect resource abundance and availability: "Past, present, and reasonably foreseeable trends and planned actions, in combination with revocation of 17(d)(1) withdrawals, would increase the potential for impacts on subsistence user access, resource abundance, and resource availability (p.3-180); "Development or infrastructure (e.g., mines, drill sites, roads, ROWs, pipelines, and buildings) activities would result in the removal, disturbance, or degradation of habitat for resources such as terrestrial mammals (caribou, moose), waterfowl, and fish, in addition to causing direct mortality"(p.3-186); and, "Mining could result in accidental discharges of chemicals and heavy metals, as well as dust deposition, which could affect terrestrial mammal (e.g., caribou, moose) health (and the health of humans who consume these resources) and displace these animals from foraging habitat." The text gets even more specific: "...stream diversions may alter or	EIS Section 3.14, Subsistence, analyzes the impacts of revocation of withdrawals, including loss of Federal subsistence priority and increased likelihood of development. Analysis of individual development projects will occur in subsequent EIS analyses for those projects.	N

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			degrade fish habitat, thereby reducing egg survival downstream.... roads and ROWs in addition to buildings, culverts, bridges, and gravel infrastructure could alter and degrade fish habitat both upstream and downstream from development projects, which could affect fish abundance for subsistence users in certain waterways" (p. 3-187). These statements identify some of the serious and long-lasting impacts that could occur, but the DEIS lacks an attempt to quantify these impacts according to the extent of revocations proposed in the action alternatives. The only quantification I could find is the estimated acreage and percent of subsistence use area impacted, per community, per alternative, that are presented in Tables 3.14-7, 8, and 9. Potential impacts to water, fish, and subsistence are important to quantify (beyond the "<1000 miles of streams and rivers" p. ES-10 and ES-14) because numerous studies have shown impacts from large-scale mining can be severe, long-term, difficult to mitigate (Limpinsel et al. 2018, Woody and O'Neal 2020, Maest et al. 2006). Moreover the current regulatory frameworks are inadequate to deal with these challenges Earthworks 2020, Sergeant et al. 2022). Add these potential D1 revocation-caused impacts to the challenges subsistence resources like salmon face from a changing climate (Crozier et al. 2021, Murdoch et al. 2023), and it is clear that Alternatives C and D will have serious additive, perhaps synergistic, and undoubtedly long term impacts that must be analyzed more thoroughly in the final EIS.		
14572-1	Barry Santana		revoking the 17(d)(1) protections will severely and negatively impact subsistence fishing, hunting and gathering for nearly 120 Alaska tribes.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14573-2	Melanie Bahnke, Brian Ridley, Vivian Korthis	Kawerak, Inc.; Tanana Chiefs Conference; Association of Village Council Presidents	A high percentage of Alaska Native peoples are impacted by Alaska BLM's land management planning decisions. BLM-managed lands support important subsistence resources and that underpin food sovereignty and security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For our Alaska Native communities off the road system, over 80% of our food comes directly from the surrounding lands and waters. A tribal member from the village of Anvik on the lower Yukon River said it well, "We don't own the land, but we belong to the land and whatever happens to the land happens to us."	See response to comment 13139-1.	N
14579-17	Deantha Skibinski	Alaska Miners Association	The subsistence analysis is flawed and misleading for several reasons. Throughout the discussion of subsistence, the DEIS focuses on the loss of ANILCA's Title VIII rural subsistence priority. The significance of this impact is overstated for several reasons. First, the only land that may be transferred out of Federal ownership because of revocation of d-1 withdrawals are Federal lands that could be conveyed to the State. According to the figures in the Executive Summary, the maximum amount of State priority 1 and 2 lands that are likely to be made available and conveyed is 343,000 acres, or less than 3% of the area. Second, even on lands transferred to the State, subsistence uses will occur on that State land, as the State of Alaska provides a priority for subsistence use on State lands. The primary difference is that the State, under Alaska's Constitution as affirmed by the Alaska Supreme Court, cannot provide a rural-only subsistence preference. Third, the Federal government is required under Section 6 of the Statehood Act to convey to the State their remaining approximately 5 million acres. If these lands are not taken from d-1 lands included in this DEIS, then the State will eventually take title to Federal lands elsewhere in Alaska. Because the DEIS has considered subsistence impacts to such a geographically broad range of communities, many of these same communities will see Federal lands that are currently State selected but not encumbered by d-1 withdrawals conveyed to the State. On a statewide scale, the amount of additional land that will be conveyed to the State and lose Federal subsistence priority will be the same regardless of the decisions made regarding d-1 lands.	The impacts of the loss of Federal subsistence priority, as a loss of rural-only preference, are clearly stated in the draft EIS. The draft EIS analyzes the impacts of the revocation of withdrawals, which would open lands to selection which are not currently available for selection. Opening lands to selection would result in a loss of Federal subsistence priority regardless of whether they are conveyed, and the draft EIS acknowledges that the loss of Federal subsistence priority would be temporary on some lands (e.g., top filed Priority 3 and 4 lands). Decisions regarding which withdrawals to revoke also affect where the loss of Federal subsistence priority would take place, and which communities would be affected. Even a temporary (e.g., 10 or more year) loss of Federal subsistence priority could have long-term impacts on subsistence use patterns. The eventual return of some of these lands, and the net loss or gain of Federal subsistence priority for each community are addressed in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14581-3	Becky Long		The No Action Alternative for the East Alaska unit is necessary for the very survival of the important Nelchina Caribou Herd. Figure 3.15-1 in the Appendix A of the draft EIS shows a majority percentage of the East unit is the range of this herd. This includes their migratory routes, calving areas and wintering and summer areas. This information is from the Alaska Department of Fish and Game. This herd is unique. The herd spends summers and fall in the highly accessible Game Management Unit 13 which is located off the road system between Fairbanks, the Mat Su Valley and Anchorage. Indeed, GMU 13 is an important hunting area for many Alaska residents yearly. Due to the many vagaries of the changing climate conditions, wintering adult and calf mortality have been high the past three years. This has led to a severe population decline and low recruitment rate. The fall of 2022 population estimate was 17,433. ADFG's statistics show the latest herd population estimate is 8,823. Thus, there is no harvestable surplus. ADFG emergency order on 6/30/2023 has closed GMU 13 hunts including both tier 1 and community subsistence hunts. This means no state hunts in one of the most popular residential hunting areas in the state. Also lifting the D-1 protections would remove the federal subsistence priority affecting the subsistence resources.	See response to comment 13370-1.	Y

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14583-1	Robert Walker	Anvik Tribal Council	that's 99 percent of the things that we're talking about when we talk among our tribes is food. And that's one of our biggest things here. That it is being somehow systematically disappearing from AYK region.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14590-2	Denis Ransy		For communities off the road system, over 80% of their food is from the lands and waters abounding them. This is a food security issue.	See response to comment 13139-1.	N
14601-1	Eric Holle		As -- speaking just for myself, I am a subsistence user of salmon. And the higher elevations in this area that are proposed for revoking are the water quality that provide the best habitat for all five species of wild salmon that we have here.	Effects to subsistence, including fish abundance and availability, resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14604-2	Grant Fairbanks		The D-1 lands are in the middle of the biggest subsistence areas in the United States. Our Yukon and Kuskokwim Salmon which spend part of their life cycle in the BLM D-1 areas are diminished to a fraction of their past populations and the extraction industry will hurt and not help this problem.	Effects to subsistence, including fish abundance and availability, resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14606-1	Beverly Ann Hoffman		Again we hear talk about economic benefits, jobs. But to open D-1 lands to projects that risk a way of life, our food security, projects that will cause damage to our fragile ecosystem already pressured by climate change.	Effects to subsistence resulting from development are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. Cumulative impacts, including impacts of climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14608-1	Melanie Bahnke, Vivian Korthuis, Brian Ridley	Kawerak, Inc.; Association of Village Council Presidents; Tanana Chiefs Conference	A high percentage of Alaska Native peoples are impacted by Alaska BLM's land management planning decisions. BLM-managed lands support important subsistence resources and that underpin food sovereignty and security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For our Alaska Native communities off the road system, over 80% of our food comes directly from the surrounding lands and waters.	See response to comment 13139-1.	N
14609-1	Frances Degnan		It is important for the indigenous tribes of Alaska to remain in place to continue as a long traditional practice of land utilization and stewardship of resources across the vast lands of Alaska. The Federal laws need to keep protections in place relating to traditional lifeway practices currently known as "subsistence economy" as the state proceeds to pursue diminishment of these practices through regulations and projects. This is food on the table for all of us. That will be lost if we lose federal subsistence protection on adjacent BLM lands. In our own Norton Sound area, the five adjacent tribes of Unalakleet, Stebbins, St. Michael, Snaktoolik and Koyuk responded to a presidential order issued in 1951 to the tribes: "to file your claims for land now". A traditional land use area consisting of nine (9) million acres of land that these tribes used was duly filed and accepted by the United States Indian Claims Commission. These claims asserted use of all land, air and forty-five (45) miles, one in the Bering Sea. We have these acreages since time immemorial and continue to rely on them for their seasonal productivity to put food on the table.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14612-1	John McIntyre	Iqfijouaq Corporation	At our last corporation meeting, the Iqfijouaq Corporation opposes the removal of protection of the D1 lands in the State of Alaska and in our region. Our people still rely on these lands for gathering food and plants for subsistence, and we do not want them to be open to outside interests that will disturb our fragile ecosystem. We are already experiencing climate change and have seen the decline of our natural resources. We have experienced fishery disasters, and other events that have contributed to the decline of our subsistence food sources, that we depend on for food security. Opening lands for outside interests will further the decline of our way of life, as we struggle each day to put food on our tables and to feed our families.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and 3 EIS Section.14.3.2.1, Impacts Common to All Action Alternatives. Cumulative impacts on subsistence, including from climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14625-2	Janet Balice		Salmon and moose and caribou the main foods for many Alaskans especially off the road system where these lands occur is in steep decline. In the land of plenty true food shortages are becoming reality. This is no time to risk water supplies, habitat loss, air quality, etc. for big corporations profit.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14630-6	Emily Johnson	National Park Service	As many as 169 NPS subsistence communities would be impacted by Alternatives B, C, and D. Access to healthy subsistence foods and subsistence priority is collectively managed across all federal lands. Removing or affecting BLM lands has a cumulative impact on subsistence access and resources in every region.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14641-26	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay	For those communities that BLM determined are likely to be significantly impacted, BLM ranks potential impacts. The ranking system is based on the quantity of [a communities'] use area acres overlapping lands losing Federal subsistence priority and lands more likely to be developed and "based on the distance of these lands from each community." However, due to the limited assumptions in RFD scenario, these rankings are likely understated. For example, on a scale from 0 to 12, the community of Kiana received an impact ranking of 5 under Alternative D.	Please see response to comment 13600-2.	N

Subsistence					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
	Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	The map of Kiana's subsistence use area generally supports this ranking as the area deemed more likely to be developed is exceedingly small in comparison to the proportion of the subsistence use area with a high potential for locatable minerals that could be open to mineral entry. BLM indicates only 30 acres of Kiana's subsistence use area is 'more likely to be developed' under Alternative D. But this conclusion is questionable given that ANCSA 17(d)(1) withdrawals would be lifted on 4,736 acres of Kiana's subsistence use area under Alternative D. BLM's limited prediction for disruption to subsistence in the community of Kiana appears to be the result of overly narrow RFD scenario parameters rather than a real-world reflection of likely development. While Kiana's subsistence use area may not be within 31 miles of a road, much of the community's subsistence use area is already open to mineral entry, and has a high potential for locatable minerals. This means that the loss of use of additional acres from lifting the ANCSA 17(d)(1) withdrawals may be compounded. BLM does not account for this. Unfortunately, this discrepancy is common to most of the subsistence study communities included in BLMs analysis. The final EIS should expand the RFD scenario in order to more accurately capture likely development and its impacts on subsistence users as "[h]ousehold participation in subsistence activities is high across all planning areas."		
14641-27	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope, Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity; Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	BLM focuses on the impacts of development but does not include the likely roads or other rights-of-way (ROWs) that would allow for access to potential development. For example, BLM indicates resource availability impacts are most likely to occur for these communities closest to parcels that would be opened to potential development and that subsistence impacts could extend outside the immediate area of development . . . where development involves infrastructure such as roads. This approach focusing on impacts from development in isolation while treating impacts from ROWs as a mere possibility misstates the subsistence impacts at stake. Oil and gas and mining operations frequently involve supportive infrastructure such as roads. As addressed above, currently proposed mining access roads, including the Ambler Road and West Susitna Access Road, would extend for hundreds of miles through undeveloped lands. This reality should be at the center of BLMs subsistence analysis. This is particularly important with regard to terrestrial mammals. As BLM recognizes, ROWs would have the largest impacts to terrestrial mammal availability because they extend across large areas and can result in changes to resource migrations and availability. In the final EIS, BLM should include the impacts of ROWs that will provide access to the areas of development within subsistence harvest areas.	A list of reasonably foreseeable future actions is provided in EIS Section 3.1.3 and includes the referenced ROWs. The potential impacts of ROWs associated with development is discussed throughout EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and the Increased Lands Open to Development sections in EIS Sections 3.14.1.2.2, 3.14.2.2.2, and 3.14.3.2.2, Impacts Common to All Action Alternatives. The impacts of revocations in combination with reasonably foreseeable developments, including the proposed Ambler Road, are addressed in EIS Section 3.14.1.2.7, Cumulative Impacts. ROWs, including the Ambler Road and West Susitna Access Road, are included as RFAs in Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area, in EIS Section 3.1.3, Reasonably Foreseeable Trends and Planned Actions. Reviewed and edited Cumulative Impacts in the Resource Sections, to ensure these RFAs, including the West Susitna Access Road, are adequately addressed.	Y
14653-1	Susie Walter	Native Village of Tununak	for Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters.	See response to comment 13139-1.	N
14664-1	Ivan Demientieff	Grayling IRA Tribal Council	For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters.	See response to comment 13139-1.	N
14669-1	David Dayton	Koyukuk Village Council	BLM-managed lands support important subsistence resources and underpin food security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yup'ik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters.	See response to comment 13139-1.	N
14678-1	Shylena Lie		One thing that I did is we are a two-family income home, and year-round we're subsisting on whatever animal is during that season. And if it's open we're going to lose all of that. And so as a two-income family home right now we're hardly even making it living here. The utilities -- our KEA bill was \$500. We have a wood stove as alternative heat that we use year-round, but our stove oil is crazy expensive. You see the heating issues that we're having right now, you know. And so we get -- you know, it's not just animals. You know, we're doing everything that we could to live off of the land, and it helps our family to be able to even function. Could you image trying to raise five young boys and feeding them if I just bought groceries from the store here? That is highly expensive. And so we were taught to live off of the land, and I have a grandpa that's 86 and all he craves is the animals off of the land. He can't provide it for himself, and so that's what my family does for him. And so I could see this as a really huge impact on financial burden when there's already a huge* financial burden to begin with in our area.	EIS Section 3.14, Subsistence, was edited to ensure the economic impacts of a loss of subsistence opportunity are adequately addressed.	Y
14681-1	Emily Johnson	National Park Service	From the BLM GIS map online: In Slana, between the Tok Cutoff Highway, the Nabesna Road, and the Copper River (immediately west and south of the parcel of NPS land that houses the Slana Ranger Station), there is a D1 parcel of land (Sec. 30 of T. 11 N., R. 8 E.) that is used by federal subsistence permit holders to access fish wheels on the Copper River located on both NPS and BLM uplands. This is a key subsistence fishing area for Slana and Tok residents. The NPS request that BLM not open this parcel to maintain federal subsistence access.	The described parcel is retained in Alternative B and analyzed as such. The Loss of Federal Subsistence Priority section in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives, was edited to include potential impacts to access and use of this fish wheel site.	Y

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14681-9	Emily Johnson	National Park Service	<p>The NPS requests that BLM recognize the following points in the DEIS and consider the included research source to determine whether there are additional impacts to caribou and subsistence resources:</p> <p>---Some of the D1 lands due south of Point Lay are within the Western Arctic Caribou Herd's (WACH) calving grounds. Development within these areas could have long-term impacts on the herd.</p> <p>---The D1 lands surrounding Cape Krusenstern National Monument (CAKR) and Noatak National Preserve (NOAT) are important for subsistence for Northwest Arctic (NWA) Borough and North Slope residents. This land is an important habitat and harvesting area for caribou, moose, muskoxen, and many avian species. These areas are used as nesting, foraging, and breeding areas for numerous migratory birds.</p> <p>---The D1 lands from just south of Point Lay down to Unalakleet, are within all of the WACH's seasonal ranges. Research (Baltensperger and Joly 2019) shows that caribou steer away from anthropogenic disturbances. Opening these D1 lands could shift caribou away from the villages into more inaccessible areas.</p> <p>Baltensperger and Joly 2019. Using seasonal landscape models to predict space use and migratory patterns of an arctic ungulate. Movement Ecology, 7:18.</p>	EIS Section 3.14, Subsistence, was edited to incorporate information regarding terrestrial mammal and bird habitat as appropriate. For example, additional information about key habitat for caribou and waterfowl are provided in the Increase in Lands Open to Development section in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives.	Y
14681-10	Emily Johnson	National Park Service	<p>Subsistence users in the Northwest Arctic (Kobuk-Seward region) will be highly impacted by BLMs decision on whether to maintain the D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitat needed for species migration and adaptation to our rapidly changing environment. Communities that depend on caribou, salmon, moose, and other subsistence resources are already encountering reductions in populations. In the Kobuk-Seward region, subsistence harvesters are facing food insecurity while being asked to harvest less to preserve species. As environmental changes continue to increase pressure on resources, we believe it is in the public interest to protect intact lands and pristine waters as a precautionary and preventative approach to resource decline. Already the decline of the sheep and caribou populations are impacting families' food security. High water years on the Kobuk and Noatak Rivers have impacted summer fishing opportunities, and erosion and permafrost melt threatened water quality and people's camps as well. We need to protect the resources we have. Now is not the time to open the landscape up to development.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence. Cumulative effects, including from climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14681-36	Emily Johnson	National Park Service	<p>Many NPS Subsistence Resident Zone or park/preserve/monument nexus communities are those listed to be most impacted under all Non-A alternatives (increasing with each alternative: 65 Alt. B and 139 Alt. C). These include resident zone communities of Wrangell-St. Elias National Park and Preserve (WRST), Denali National Park and Preserve (DENA), Lake Clark National Park and Preserve (LACL), Western Arctic parks (WEAR), and Bering Land Bridge National Park and Preserve (BELA). Each of the D-1 withdrawals may not necessarily directly impact park lands, waters, or fish and wildlife resources directly but access to healthy subsistence foods and subsistence priority is collective and managed collectively across all Federal lands. Removing or affecting BLM lands has cumulative impact to subsistence access and subsistence resources in any given region.</p>	Cumulative impacts on subsistence are described in EIS Section 3.14.1.2.7, Cumulative Impacts. EIS Section 3.14, Subsistence, was edited to address proximity of many affected communities to NPS lands.	Y
14681-40	Emily Johnson	National Park Service	<p>Caribou abundance and distribution as a subsistence resource - Table lists increasing acreage of potential impacts to numerous important caribou herds extremely important to NPS subsistence communities (and many other subsistence communities). These include caribou herds that are in precipitous decline and subsistence harvest is being dramatically reduced or has been closed altogether: Western Artic Herd - subsistence harvest reduced under State regs and proposed dramatic reductions also under Fed. regs, Nelchina Caribou - subsistence harvest just closed completely under emergency action due to the dramatic decline of this herd, Denali and Mentasta herds declining. And while this EIS does not list the Mulchatna herd, the D-1 withdrawals will affect lands important to the health and habitat in the range of the Mulchatna Caribou herd - subsistence harvest of this herd is currently completely closed due to conservation concerns for this herd as well. Any potential development on these D-1 withdrawals could have a significant negative impact to the overall health, abundance and availability for subsistence for all of these herds that are already struggling. Including loss of habitat directly or deflection of herds away from development areas due to disturbance, incursion of roads across migratory routes, fugitive dust and industrial contaminants affecting water and forage.</p>	EIS Section 3.14, Subsistence, was edited to address hunting closures in the range of the Mulchatna Herd, including discussion in the Loss of Federal Subsistence Priority section in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives, and effects on the abundance and availability of the Mulchatna Herd, including discussion in Section 3.14.1.2.7, Cumulative Impacts and in the Increase in Lands Open to Development section in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives.	Y
14681-45	Emily Johnson	National Park Service	<p>The BLM has found in this preliminary ANILCA 810 evaluation that Alternatives B, C, and D and the cumulative case considered in the draft EIS may significantly restrict subsistence uses BLM does recognize in the findings that: "Past, present, and reasonably foreseeable future activities, in combination with revocation of withdrawals on 17(d)(1) withdrawals, would increase the potential for impacts on subsistence user access, resource abundance, and resource availability," and "The</p>	EIS Appendix C, ANILCA 810 Evaluation, was edited to incorporate additional discussion as requested.	Y

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			<p>cumulative case for the ANCSA (d)(1) withdrawals as presented in this analysis may result in significant restriction to subsistence uses affecting user access and availability and abundance of subsistence resources for the same communities listed in Alternative B, C, and D. Alternatives that revoke the greatest acreage of 17(d)(1) withdrawals have the greatest potential effects to cumulative impacts on subsistence uses and resources, because those alternatives would be more likely to cause the greatest immediate loss of Federal subsistence priority and because those alternatives would be more likely to open new lands to development."</p> <p>Elsewhere in the DEIS BLM includes a more thorough overview of the ways opening lands may cause significant restriction to user access, availability and abundance of user resources. The NPS requests that BLM include that detail in the ANILCA 810 findings as well.</p> <p>For example, on page 3-155 under Cultural Continuity and Community Health: "Many rural households diet can be over 50% subsistence foods, and sharing subsistence foods an important aspect of cultural traditions and overall community health. Loss of access to subsistence resources traditional hunting, fishing, and gathering areas, can break down the cultural continuity and transmission of knowledge from one generation to the next - important for healthy subsistence way of life and safety out on the land," and on page 3-157 "As described in Section 3.14, Subsistence, revocation of withdrawals could result in a loss of Federal lands on which rural residents have the benefits of subsistence priority, including higher harvest limits, more advantageous hunting seasons, and the ability to hunt according to traditional customs. In some cases, the loss of lands with Federal subsistence priority could result in residents traveling farther to access lands where Federal subsistence priority remains. If 17(d)(1) withdrawals changed from Federal to State management, priorities such as the ones mentioned above would no longer be available for rural residents, and residents would likely see an increase in outside harvesters in these areas, thus increasing pressure on caribou, moose, and salmon populations and decreasing the portion of takes that would provide food for the community. These changes to subsistence access and resource abundance and availability would decrease cultural continuity in the communities impacted (communities are listed in Section 3.14). Because subsistence activities strengthen community and family social ties, as well as reinforce community and individual cultural identity, decreasing the role of subsistence in a community decreases cultural continuity and the ability of the community to pass on cultural traditions. Additionally, changes to subsistence access and resource abundance or availability would affect food security and the nutritional value of residents' diets (see Section 3.14 for additional details). Also, concerns about contamination of subsistence resources from any type of development could result in lower rates of consumption of subsistence foods."</p> <p>These above details are important impacts that could be summarized in the 810 findings.</p>		
14685-1	Ruth Iten		<p>I am concerned about losing our trail systems. We need these winter trails, and if any development were to fragment where we go we would lose this way of life. This concerns me. If these lands were opened our family and our neighbors may lose our subsistence lifestyle.</p> <p>We have heard a lot about noise -- noise and animals. If these lands were open the noise would increase. The animals would decrease. These lands are in use now. They are used by the people who live there, used with respect.</p>	Effects on user access are described in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives, and impacts to subsistence resource availability from noise and traffic are described in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives. EIS Section 3.14, Subsistence, was edited to ensure impacts to trail systems are adequately addressed.	Y
14685-2	Ruth Iten		If the lands were to be conveyed to the state we would lose our subsistence ANILCA rights. The lands I am talking about on the northeast shore of Hotham Inlet and up into the Squirrel are (d)(1) lands.	Effects to subsistence, including a loss of Federal subsistence priority and increased development on the referenced lands in the Kobuk-Seward Peninsula planning area, are addressed in EIS Section 3.14, Subsistence.	N
14686-4	Brooke Woods, Melissa Shapiro	Permafrost Pathways at Woodwell Climate Research Center	Conversely, eliminating the 17(d)(1) safeguards only serves to invite a threat to habitats and migration routes of caribou and birds, and to the salmon streams that sustain Indigenous Ways-of-Life. For Alaska Native communities living off the road system, over 80% of food consumed comes directly from the surrounding lands and waters. In a region experiencing rapid ecological fluctuations due to climate change, opening the D-1 lands will ultimately create more stress on fish and wildlife populations, and jeopardize the ability of these natural systems to support vital subsistence resources for Alaska Native communities.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. Cumulative impacts on subsistence, including from climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14688-1	Susan Georgette		<p>On the map that I looked at the lands I'm most familiar with are the ones in our borough here, especially lands north and south of Ambler, Shungnak, and Kobuk. The Pah River area, lands adjacent to Selawik National Wildlife Refuge, and the lands on the Baldwin Peninsula, and south of Selawik Lake. I've traveled a lot on these lands. These lands provide habitat for all kinds of fish and animals -- caribou, moose, wolves, bears, whitefish, pike, salmon, among others.</p> <p>Some of these areas are migration and wintering areas for the Western Arctic Caribou Herd, which we've already heard has been in decline in recent years. Many of these lands are routinely used by subsistence hunters in our region, mostly in the winter months. I would say some of the main</p>	17(d)(1) withdrawals along the Pah River, Baldwin Peninsula, and south of Selawik Lake would not lose Federal subsistence priority and are not considered more likely to be developed. Potential impacts to subsistence uses of the Western Arctic herd are discussed in EIS Section 3.14.2, Subsistence, Resource Abundance, and EIS Section 3.14.3, Subsistence, Resource Availability. Potential impacts to user access, including access to trails, are discussed in EIS Section 3.14.1, Subsistence, User Access.	N

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			winter trails that we travel with, by snowmachine, across these lands, especially between Selawik and Ambler/Shungnak, and between Selawik and Buckland.		
14688-2	Susan Georgette		<p>I want to mention a few areas in particular that I feel really strongly about needing protection. One of these is the headwaters of the Tagagawik River, which is often called the Tag River in our region. It's a major tributary of the Selawik. There are a lot of other rivers draining into Selawik River where the upper reaches of those streams and rivers are in the (d)(1) lands.</p> <p>I believe that it's critical to maintain the protection on these lands because they provide protection for the continued water quality and quantity on the Selawik Refuge. The Selawik River is incredibly rich in fish. It's kind of an easy living place in our region. It has so much easily accessible food. It has only one of -- it has one of the only two sheefish spawning areas in northwest Alaska.</p> <p>That Upper Tag River was al- -- has also traditionally been a trapping area for Selawik folks. I've heard Selawik elders talk about this, and aboutold Inupiaq settlements there, and about lots of old stories up there. Stories about magical rocks, and about the first contact with white people that came through that area. So there are a lot of cultural resources there was the point of that.</p>	<p>See response to comment 13851-2 regarding specific areas needing protection. 17(d)(1) withdrawals along the Tagagawik and Selawik rivers would not lose Federal subsistence priority and are not more likely to be developed.</p> <p>EIS Section 3.7.1.1.1, Physical Habitat, already describes the importance of the general area described in the comment for Sheefish.</p>	N
14688-3	Susan Georgette		The other place I wanted to mention was the Pah River Flats. I saw that that was included in these (d)(1) lands. I've been able to go up there by boat a couple times with my family after breakup and camp for several days. And, again, it's an incredibly rich area for fish and for bears and waterfowl.	See response to comment 13851-2. 17(d)(1) withdrawals in the Pah River Flats would not lose Federal subsistence priority and are not considered more likely to be developed.	N
14700-1	Gisela Chapa	Seward Peninsula Subsistence Regional Advisory Council	Subsistence users in the Seward Peninsula will be highly impacted by BLM's decision on whether to maintain the D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitat needs for species migration and adaptation to our rapidly changing environments. Communities that depend on caribou, salmon, moose, and other subsistence resources are already encountering reductions in populations. In some regions, subsistence harvesters are being asked to harvest less to preserve species. As environmental changes continue to increase pressure on resources, we believe it is in the public interest to protect intact lands and pristine waters as a precautionary and preventative approach to resource decline.	Effects to subsistence, including a loss of Federal subsistence priority and increased development in the Kobuk-Seward Peninsula planning area, are addressed in EIS Section 3.14, Subsistence.	N
14702-18	Catherine Heroy	State of Alaska	The DEIS refers to state hunting as "sport" hunting. This is incorrect. The State has "general" hunting regulations. Using the term "sport" hunting implies that local and non-local hunters are simply out for sport and do not use the meat or other animal parts. Under general hunting regulations, most of the animals harvested are harvested for consumptive purposes by rural and nonrural residents alike. State management tools used to protect consumptive uses include restrictions on non-resident hunting and implementing Tier II hunts when warranted. It is the State's constitutional obligation to ensure all residents have an opportunity to continue hunting. Under ANILCA, it is also the BLM's obligation to ensure that all individuals have an opportunity to continue their traditional activities, even when such activities may fall outside of the federal subsistence regulations promulgated under Title VIII. We request that references to the State hunting regulations remove the word "sport" and replace it with "general" when referring to state allowed hunting practices.	EIS Section 3.14 (Subsistence) does not refer to state hunting as sport hunting; it notes that the State "distinguishes between subsistence harvests from nonsubsistence (e.g., personal use, sport, or commercial) harvests based on where the harvest occurs . . ."	N
14702-19	Catherine Heroy	State of Alaska	<p>Subsection 2.14.1.1.1 Subsistence Management of the DEIS describes how lands are managed for subsistence uses and how they would be managed under the different alternatives. We strongly disagree with the overall conclusions reached on subsistence impacts caused by lifting the withdrawals on State selected 17(d)(1) lands.</p> <p>We note that Alaska Statehood Act selections filed under ANILCA 906(e) are considered future land selections and become valid land selections once the land becomes vacant, unappropriated, and unreserved (VUU), as defined in section 6(a) or (b) of the Alaska Statehood Act. ANILCA 906(e) top-filed selections are valid because they were selected in accordance with law and were not found void ab initio or after initial adjudication by BLM. Therefore, the top-filed lands are validly selected under ANILCA, and these selections will become effective when the withdrawals are lifted.</p> <p>ANILCA section 102(3) states: (3) The term public lands means land situated in Alaska which, after the date of enactment of this Act, are Federal lands, except (A) land selections of the State of Alaska which have been tentatively approved or validly selected under the Alaska Statehood Act and lands which have been confirmed to, validly selected by [emphasis added], or granted to the Territory of Alaska or the State under any other provision of Federal law; [emphasis added]</p> <p>Given that federal subsistence (use subject to ANILCA Title VIII) is not, or should not be, occurring on state-selected lands, the premise put forward in the DEIS that lifting the withdrawals will result in opening hunting up to larger user groups, thus increasing competition for local subsistence users"16 is true but misleading; it would apply only to a portion of the lands withdrawn by the PLOs under review in this DEIS. If BLM is allowing federal subsistence to occur on these lands we request the legal foundation in which this is being allowed.</p>	EIS Section 3.14, Subsistence, analyzes only where there would be a loss of Federal subsistence priority as a direct result of revoking withdrawals on top filed lands. Top filed lands are not effective selections, and therefore Federal subsistence priority applies on these lands. Once revoked, these lands would become effective selections and lose Federal subsistence priority. If these withdrawals are not revoked, they would remain unavailable for selection and would remain under Federal management. EIS Section 3.14, Subsistence, acknowledges that the loss of Federal subsistence priority may be temporary on some lands that are not conveyed and provides an analysis of lands that would likely return to Federal management once relinquished by the State. For more explanation of top filings, specifically on how it has no legal effect until it becomes an effective selection, please see State of Alaska, 182 IBLA 396 (2012).	N

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			<p>It is true that those lands which would convert from top-filed to selected upon revocation of these PLOs would, at least temporarily, be unavailable for federal subsistence. However, they are neither the majority of the lands covered by the PLOs nor guaranteed to transfer to State ownership, given the State's over-selected status. Revoking these PLOs would allow adjudication of top-filed selections to progress as previously discussed in our comments. Following adjudication, the public would have greater clarity as to what lands would be eligible for federal subsistence.</p> <p>If the withdrawals are lifted:</p> <ul style="list-style-type: none"> -Tentatively approved and validly selected lands, excluding top-filed lands, would continue to be unavailable to use as outlined in ANILCA Title VIII. -Most Native-selected lands would continue to not be subject to Title VIII. -Lands currently top-filed by the State of Alaska would not be subject to Title VIII if the top-filings convert to valid selections. These may revert to general BLM lands following selection adjudication between BLM and the State. -Lands that revert to general BLM lands after adjudication of State and Native selections and top-files will remain subject to Title VIII. 		
14702-20	Catherine Heroy	State of Alaska	<p>Subsistence - Loss of cultural continuity</p> <p>The DEIS (Page 3-157 and other places) states that there will be a loss in cultural continuity if the federal subsistence priority is removed. Maintaining these withdrawals will negatively affect former rural residents, including tribal citizens, seeking to engage in their customary and traditional practices. As proposed in this guidance document and this analysis, any Alaskan who does not reside in a rural community as defined by the Federal Subsistence Board (FSB) does not qualify as a federal subsistence user, and therefore will not be able to help and participate in these customary and traditional uses with their federally qualified family members and friends. The DEIS ignores this group of affected users by focusing on FSB protections for rural residents rather than providing the public with a complete understanding of the full effects of revoking the withdrawals. The DEIS ignores the substantial portion of federally qualified users utilizing existing state general hunting regulations which do not have a corollary in federal regulations. As of nearly two decades ago, the First Alaskans Institute reported that the urban Alaska Native population (42%) is increasing and of the 143,587 Alaska Native people residing in Alaska, 73,571 (51%) reside in federal non-rural communities (2012-2016; Alaska Dept. of Labor). Many rural and non-rural residents alike rely on wild foods for at least a portion of their overall protein intake. In 2017, harvests by residents of urban communities comprised over 25% of the total pounds of annual wild food harvest in Alaska. Additionally, most wild food harvests by urban Alaskans occur in personal use and sport fisheries and general hunts.</p> <p>The BLM acknowledges the state subsistence opportunities but does not consider impacts of this proposed rule on state subsistence users that can, regardless of where they live, currently participate in these customary and traditional uses. The DEIS fails to analyze the impacts to these users, who want to continue to practice their customary and traditional uses and Alternatives A, B, and C would negatively impact Alaskans who want to continue their longstanding ways of life.</p>	EIS Section 3.14.1.2.7, Cumulative Impacts, has been edited to address potential impacts to sharing networks. Section 3.14, Subsistence, has also been revised throughout to acknowledge where development impacts would also occur for nonrural users of the 17(d)(1) lands. For example the Increase in Lands Open to Development section in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives, has been revised to state that nonrural residents may experience similar impacts on user access resulting from development.	Y
14702-21	Catherine Heroy	State of Alaska	<p>In the DEIS, the BLM also does not recognize the limitations Congress included in ANILCA Sec. 815(3) which prohibits restrictions on non-subsistence take of wildlife when there is no conservation concern or shortage of resources for federal subsistence users. Section 815 states Nothing in this title shall be construed as--</p> <p>(3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands (other than national parks and park monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law</p> <p>This EIS analysis does not provide data that shows an impact to fish and wildlife populations that present a conservation concern. Instead, it relies on assumptions that increased competition could decrease take opportunity without data to support that conclusion. In the event that the State identifies impacts to sustainable fish and wildlife populations, ADF&G would close an area or species to hunting or fishing in order to conserve populations. We request the BLM consult directly with ADF&G to discuss any conservation concerns.</p>	The benefit of Federal subsistence priority for rural users as it relates to higher bag limits, longer hunting seasons, and harvest preference (i.e., closures to nonrural residents) is clear. While the State manages its lands to ensure sustainable harvests, it does so without preference to rural users. The Loss of Federal Subsistence Priority section in EIS Section 3.14.1.2.2, Impacts Common to All Action Alternatives, was edited to incorporate data regarding an increased number of moose hunters within a GMU being correlated with a decrease in household moose harvests. The BLM does not propose any "restriction on the taking of fish and wildlife for nonsubsistence uses" to which analysis in the EIS is required. As such, section 815(3) of ANILCA is inapplicable.	Y
14702-27	Catherine Heroy	State of Alaska	Appendix G and throughout documents; Inconsistent mapping between the web map and maps in Appendix G; specifically, Chilkat/Klukwan. Some maps say Chilkat, and some maps say Klukwan; both are valid in USGS GNIS but inconsistent naming is confusing, especially for people who are not familiar with the area. Please choose Chilkat or Klukwan; DNR recommends Klukwan to be consistent with older USGS mapping.	EIS Appendix A, Figures, and EIS Appendix G, Subsistence Technical Appendix use Klukwan.	Y
14709-1	Earl Samuelson		I was kind of concerned, because in the recording it we mentioned rural Alaska subsistence would not be affected. And I had a I very disagree with that, unless I misunderstood it, because we're not	EIS Section 3.14, Subsistence, addresses potential impacts of increased competition on all subsistence communities, including communities on and off of the road system, in Section	Y

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			<p>on the road system.</p> <p>But if you go out during subsistence needs or hunting time, it is affected by a lot of outside hunters coming in affecting local hunters and not filling their needs. It's happening right now in our region, especially during the moose season, fall time.</p> <p>And I think it's maybe you didn't do that research. If you go during the hunting time you'll see the impact. And I can see right here it will affect our region tremendously. So I just to let you know. It's happening. It's going to happen again next season too.</p>	3.14.1.2.2, Section 3.14.2.2.2, and Section 3.14.3.2.2, Impacts Common to All Action Alternatives. EIS Section 3.14, Subsistence, was edited to ensure the topic of existing competition from outside hunters in non-road connected communities is adequately addressed. For example, Section 3.14.1.1.4, Existing Conditions, was revised to include discussion of existing impacts of competition on subsistence uses, and the Loss of Federal Subsistence Priority section in EIS Section 3.14.2.2.2, Impacts Common to All Action Alternatives, was revised to add context regarding existing levels of competition in the Kobuk-Seward planning area.	
14710-1	Brandon Ahmasuk	Kawerak, Inc.	<p>But the comments that I have are more related to going in deeper into the subsistence part. Subsistence users and subsistence resources alike will be negatively affected if the (d)(1) land restrictions are removed. Resource development in rural areas will have negative effects on the environment where there is little to no oversight from the State -- State of Alaska permitting agencies.</p> <p>Multiple regions across Alaska are basing the multi-species salmon crash, resource development, and -- or, around our communities, could have even more of a negative impact on this.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14713-1	Emily Murray	Norton Bay Watershed Council	<p>Because these (d)(1) land withdrawals are within geographic range, or near small-populated, rural communities, the land withdrawals proposed by the previous administration would severely impact our subsistence economy.</p> <p>Alaska rural communities are predominately engaged in a subsistence economy with a cash overlay. If you notice, it's not a cash economy with a subsistence overlay. We are a subsistence economy with a cash overlay. There's a great difference in that.</p> <p>Alaska indigenous people hold a complex, innate connection to clean water, salmon, edible greens and berries, and wildlife from both the land and ocean based on the sustainable economy.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14716-1	Gloria Simeon		<p>Subsistence is not a way of life, it is our life. Food insecurity is very real in our villages. Along both the Yukon and Kuskokwim Rivers. Our brothers and sisters on the Yukon have not been able to fish going on four years now.</p> <p>What does it do to your mind when you know your smoke house is empty and you're not ready for winter? Our rights to hunt and fish are being eroded through regulation and poor management. We must be able to access the food sources we depend on. The land and water are where we go when we are hungry.</p> <p>As is the case right now, supplemental food benefits from the federal government, through the State of Alaska, do not always reach those intended when needed most of all. Additionally, Alaska is at ground zero for climate change. As the skin of our tundra becomes thinner and thinner our villages are sinking. Changing weather patterns have caused serious erosion along our coast and waterways. These have interrupted the cycles of life as we know them and broken the threads that weave our families, our villages, and ourselves together.</p>	Effects to subsistence are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. Cumulative impacts on subsistence, including from climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14719-2	Grant Fairbanks		<p>These (d)(1) lands are in the middle of the biggest subsistence area in the United States. Our Yukon and Kuskokwim salmon, which spend part of their lifecycle in the BLM (d)(1) areas, are diminished to a fraction of the past populations, and the extraction industry will hurt and not help this problem.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority, including in the Bering Sea-Western Interior planning area, are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14730-2	Kathryn Martin	Ahtna, Inc.	<p>ANCSA 17(d)(1) land withdrawals would increase the impacts on subsistence user access, resource abundance, and resource availability. Revocation of withdrawals and their associated changes in land management and development opportunities would result in negative impacts to resource abundance, resource availability, and subsistence user access for communities in the East Alaska planning area who currently harvest wildlife resources that utilize and migrate through 17(d)(1) withdrawal areas. Noise, traffic, and human activity will affect resource availability by diverting resources from their home ranges and migratory routes or cause an irreversible shift in resource distribution.</p>	Effects to subsistence resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14.1.2.2, Section 3.14.2.2.2, and Section 3.14.3.2.2, Impacts Common to All Action Alternatives. Impacts to resource availability (including potential changes in migration or distribution) from an increase in development-related noise, traffic, and human activity are described in the Increase in Lands Open to Development section in EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14732-1	Anuska Wysocki		<p>We depend on subsistence resources to sustain us, the moose, the caribou, migratory birds, freshwater fish and salmon. All these resources are utilized and depend on all the lands. They don't just stay in one place. They're continually moving, continually migrating.</p> <p>That's why, before, in when we in in my parents, our ancestors, they used to follow the game subsistence. Even now I come down here in the summertime and do salmon, and then I move back up to my village. We're always moving. And it's because of we depend a lot on our subsistence foods.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14734-1	Delores Larson	United Tribes of Bristol Bay	<p>The (d)(1) withdrawals are if the (d)(1) with withdrawals are revoked it could impact our subsistence, both through the loss of federal subsistence priority and opening those lands will be subject to development.</p> <p>Lifting (d)(1) withdrawals could fragment habitat, shifting migration routes that could potentially</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N

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			decrease or diminish the caribou and moose populations, and in turn decrease our access to subsistence resources.		
14741-2	Eddie Clark		<p>You know, also, another note is we enjoy subsistence hunting, say, for moose, and we have we have the park, we and we have the feds close to us. The fed federal lands really give us an advantage, and we like that, for our moose hunting, which, you know, is pretty close to us. We have we have a lot of agencies that are real close to our boundaries where we've been hunting and fishing, and the feds have been really good with our subsistence, and especially our moose hunting. So I would hate to lose those grounds we have.</p> <p>...</p> <p>You know, the feds we're surrounded a lot by the park, the feds, the state, Native corporations oh, just a lot of stuff in our subsistence area, and right at the moment we enjoy a better advantage as a Native in the subsistence arena in our region right now under the federal lands instead of the state land situation.</p> <p>And so I like the way we have it right now, and we very seldom see a federal officer ever come. But the state people are always bugging us about something. We actually get a five day head start. We get all kinds of different things that this is to our vantage.</p> <p>And some of us just cannot afford all the equipment that, say, the lodges or the guides or anything have, but and so it's a lot easier for just a regular person, a regular Native, just to keep their lifestyle going. So I kind of like to have the federal control at the moment. So I'd like to keep it that way.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14755-1	Jerry Ivanoff		<p>And I would like to the federal government to protect our resources, because we live in unprecedented times. Our chum crash in 1992. The king salmon crash in 2000. The coho crash of 2020. The king salmon crash in 2023. We've lost all our salmon. Our caribou have dropped from 500,000 to 160,000. We've got people flying around in Super Cubs changing patterns of migration of our mammals that we depend on. A lot of our subsistence means we put food on our table. We want to protect that. And I'm against revocation of this withdrawal because it would take away our subsistence priority. And we, as a people, depend on that subsistence priority. I can't buy beef. I need my moose. I need my caribou. So we need to get those people to quit commercialization of our caribou resource. We need to stop commercial guiding on federal lands. For all of our mammals, our moose, and our caribou until we can get our fish back. We can't even put fish on our table because of state management and federal management.</p>	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14761-1	Rachel Donkersloot		<p>Secondly, in terms of the potential impacts of Alternatives B, C, and D, I wanted to cite, or at least reference, the large body of scholarship that demonstrates how continued access to traditional lands and waters in Alaska Native communities contributes to individual and community well being, and it does that in diverse ways.</p> <p>We know that food security and food sovereignty are important dimensions of well being in indigenous communities across Alaska.</p> <p>So when I look at some of the maps showing (d)(1) lands in relations to salmon streams, caribou migration patterns, and other important lands for moose, birds, et cetera, it's really unclear what the impacts of lifting these protections would be, because there's so much uncertainty around the development scenarios that could emerge from any alternative, other than Alternative A, taking no action.</p> <p>(d)(1) land protections help to ensure the subsistence practices continue, and that the next generation has the opportunity to engage in these practices and provide for their families and communities in ways that make them physically, socially, culturally, and spiritually healthy.</p> <p>Alternative A also aligns with the many executive orders and presidential memos that have come out in recent years focused on, one, better addressing equity and environmental justice concerns, especially impacts to tribes and other, quote, unquote, underserved communities. And two, more generally, trying to improve tribal relations and the federal trust responsibility.</p> <p>More than half of the tribes in the State of Alaska have come out in opposition to lifting these protections in any form. And that's meaningful because not only do Alaska Native communities often bear the greatest burden when it comes to conservation solutions, they also bear inequitable impacts to climate change.</p> <p>It's unclear how lifting these public land orders will impact subsistence resources and practices or limit the adaptive ability of communities to respond to our changing climate. It raises the question of how, in any way, is lifting these protections responsive to all the work being done at the federal level, in particular to support and foster climate resilient communities.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
14764-1	Teresa Simeon	Chuathbaluk Traditional Council	<p>I know so many years back BLM came to Jokpuluk (phonetic) and had elders come and share about hunting and gathering traditional hunting, gathering areas.</p> <p>I don't know if BLM selected those areas during that time, but I'm to me I believe that, you know, subsistence hunting and gathering should be the top priority covering you know, covering our area.</p>	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N

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			Our area is not a our employment here in our area is not as high as a lot of other places. And what we live off of in this area is our subsistence way of life due to a high cost of living now. I think we BLM really needs to protect our subsistence lifestyle up this way, in this area, and a lot of other areas where they depend on subsistence, you know, year round. I think a lot of us, too, that came here, is the reason you know, why we're here is due to our subsistence lifestyle here in this area. But I really hope you guys consider those the elders that have shared, the lands of the gathering and hunting.		
14765-2	Emerie Fairbanks-Diehl		These (d)(1) lands are in the middle of the biggest subsistence areas in the United States. Our Yukon and Kuskokwim salmon, which spend part of their life cycles in the BLM (d)(1) areas are diminished to the fraction where their past populations and the extraction industry hurt and not help this problem.	Effects to subsistence access, resource availability, and resource abundance, including impacts to fish harvesting, resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
14830-1	Lisa Wax		I'd also like to highlight that 77 percent of all of the rural federal subsistence occurs within the East Alaska management area where there also happens to be the most top filings.	EIS Section 3.14, Subsistence, highlights the particularly high number of lands lost to Federal subsistence priority, and the high number of Federal subsistence permits, in the East Alaska planning area.	N
14830-2	Lisa Wax		So that land, were it you know, were it to lose its protections, those folks would lose their federal subsistence instantly. Also, I did notice two ways that many communities could have been left out. First, folks I mean, I I certainly know many folks that travel beyond the 50 miles addressed in the EIS in order to hunt or fish, and so I I think that really needs to be looked at, that 50 mile radius. And I'm also concerned that the communities that have not been previously analyzed, and therefore are not in the data basis, that they're just left out. You know and on the flip side, communities that have been analyzed and have been used, it's such a wide range for the EIS that there could be a community that was analyzed 30 years ago. And that 30 year old analysis is what we're basing this on. And as we know, things are changing rapidly, and that is not really sufficient.	The 50 mile radius to select study communities has precedence in previous EIS analyses and is based on an analysis by ADF&G which shows that a majority of subsistence activities occur within 50 miles of a community. The draft EIS includes any community within 50 miles, including communities with no subsistence use area data. EIS Section 3.14, Subsistence, was edited to address concerns that the 50 mile radius does not adequately capture the distance traveled for subsistence, particularly for road-connected communities, and includes an analysis of Federal subsistence permit data for Unit 13, where a majority of Federal subsistence permits are issued.	Y
14830-3	Lisa Wax		And then I also would like to point out that the activities of communities like Valdez, they're well, actually, really, Valdez, Homer, Seward, Kenai, Ketchikan, Juneau, Anchorage, Palmer, Wasilla, and Fairbanks to be more specific, their like, basically their their hunting and fishing, for many of those folks, should be rec recognized as more than just recreation. And I I think that's also an insufficiency, that, you know, feeding your family is you know, it may be fun, but it's not it's not recreation, and I don't feel like that's being sufficiently acknowl acknowledged.	EIS Section 3.14 has been revised to indicate where development impacts would also occur for nonrural users of the 17(d)(1) withdrawals.	Y
14831-1	Pamela Miller		I will comment in favor of Alternative A. It's the only one that can support our public lands for all the public and for the purposes for which we hold them for the public. This should be for all 28 million acres of the (d)(1) withdrawal areas. These are vital lands and waters which support caribou herds, millions of migratory birds and their habitats, and the federal subsistence priority for rural residents. That federal subsistence priority is important because of its support of habitats that support migratory birds. Climate change is increasing across Alaska, and accelerating impacts to migratory birds are of grave concern. That means that even greater precaution should be afforded to the (d)(1) withdrawal areas to the people who depend on those resources for their sustenance and cultural heritage, as well as all the existing and proposed ACECs and research natural areas and other special designations that BLM holds.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. Cumulative impacts on subsistence, including climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14834-1	Sue Mauger	Cook Inletkeeper	And the the analysis to look at the impacts on subsistence resources for communities who may some of which may be in a like, literally moving their community to a new place because of the effects of climate change where they can no longer stay on those coastal habitats or the permafrost is changing literally the the ground beneath their feet. The uncertainty that they are dealing with, and needing to consider to move to new places, this is a perfect opportunity to keep these lands prioritized for subsistence use, because a lot of these lands and people are going to be moving, and landscape. And and I think this is exactly the time that we ought not to be making drastic changes to the intact ecosystems that exist on our landscape.	Cumulative impacts on subsistence, including climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
14839-1	Austin Ahmasuk	Native Movement	Revoking the (d)(1) withdrawals I think would pave the way for development, and that would very much irreversibly alter habitats that I've grown up with all my life. Consequently it would impact fish and wildlife. They're not just numbers in the report, or they're not just numbers in the EIS, but they are integral to our way of life, and they've sustained indigenous people for thousands of years.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives. The importance of subsistence to rural and Alaska Native residents is described in EIS Section 3.14, Introduction, Subsistence, and potential social and cultural impacts associated with a loss of subsistence opportunity are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N

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15-1	Tracey Schaeffer		<p>2 areas that drive all of my actions in rural Alaska are trauma and wellbeing. While I'm not from here I have been very blessed to have had the opportunity to live and raise children in a subsistence lifestyle. When you have worked hard with your family and then sit down to enjoy all of the foods you've hunted, gathered and prepared it's a spiritual experience, full of ritual and love for others and nourishment on many levels. Subsistence needs to be protected as much as religion. Mental health is driven by physical health, including gut health which is best when you are eating healthy foods that you value. It's not just food, it's much deeper than that and it can't be replaced. Subsistence is resilience, which is the answer to overcoming trauma.</p> <p>The trauma of others coming in and taking from indigenous people with the facade of jobs and opportunities needs to end. Those are temporary but the impact is forever. Losing clean water, access to caribou, waterfowl, fish are all devastating. Tracts of wilderness are the planets lungs, the biodiversity they support is necessary to maintain whatever time we have left in the world as we know it. We are the canary in the coal mine and we already are sloughing away.</p>	See response to comment 13957-3.	Y
1803-1	Judith Books		It would also put at risk the vital subsistence resources that Alaska Native communities depend on as people who participate regularly in hunting, gathering, and fishing traditions.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
2016-1	Linda Schneider		As discussed below, I favor keeping these D-1 lands closed to development. Some things are too precious and unique to put in danger. Short-term profits will not adequately compensate or restore these ecosystems or livelihoods for people depending on them if they are damaged! We need to think of the future, not the short-term present. I suspect that those advocating for mining or development won't want to pay the cost of adequate protections for these lands, even if such protection is possible, which it may not be. Some risks are too big to take!	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
2303-1	Ayesha Vavrek		More than 80 Tribes and Tribal organizations in Alaska have signed a letter to U.S. Secretary of Interior Deb Haaland noting that: for Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters." We should consider it our human + ethical responsibility to protect these food resources for the First Nations' people. Also, in this time of Climate instability we need to work to protect our Planet rather than destroy "lands (that) are critical to biodiversity and as intact ecosystems, help to serve as a carbon sink and to provide a buffer to our changing climate	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
2571-1	James Jordan		In a region already experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations. It would jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence. Cumulative impacts on subsistence, including climate change, are described in EIS Section 3.14.1.2.7, Cumulative Impacts.	N
3021-1	Haley Hoover		Land support communities by providing access to hunting, fishing, and subsistence opportunities while promoting the health of our natural systems. Health of the renewable resources directly correlates to the health of Alaskan communities. Intact watersheds free from fragmentation, promote healthy farmlands that are harvested all over the State for subsistence, and commercial and commercially by small business owners	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
3021-3	Haley Hoover		Fragmentation disrupts the natural flow and connectivity of habitats impacting the movement and survival of wildlife leading to an irrevocable cascade of negative impacts on renewable resources, and the communities that rely on them. Maintaining the health of these habitats is vital for sustaining salmon populations and subsistence and commercial practices associated with them.	Effects to subsistence, including fish harvesting, resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
3023-1	Hal Enerson		Opening the D-1 lands would also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	Effects on resource availability of subsistence resources, including fish, are described in EIS Section 3.14.2.2.2 and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
305-1	Eileen Dunn		In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	See response to comment 2571-1.	N
3534-2	Joanne Kelly		In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	See response to comment 2571-1.	N

Subsistence					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
3866-1	Lisa Docken		Traditional cultures and natural resource use for our subsistence lifestyles and the Alaska Native culture are an asset that should not be compromised for any reason. We are risking the subsistence lifestyles specifically; wildlife habitat connectivity and salmon habitat (to name a few) used by underserved communities, who are the people that need your advocacy the most. Lifting protections across these landscapes is only giving the state a short term gain. Protect the lands that sustain us. Advocate for those that are less connected and may not be able to advocate for themselves and ensure the future of wild lands that are an asset.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
41-1	Barry Santana		Lifting the D-1 protections and opening the lands to industrial development would fragment many of our last remaining intact landscapes, affect migratory corridors for large game and significantly impact important salmon streams that provide habitat diversity of unique watersheds. In a region experiencing out of control historic norms due to climate change, opening the D-1 lands will cause unknown problems while creating more stress on fish and wildlife populations. It will also no doubt adversely jeopardize the habitat and ability of these natural systems to support vital subsistence resources, Alaska Native communities, and hunting and fishing opportunities.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
4761-1	Mary Ames		In a region experiencing four times the ecological fluctuations that other regions suffer as a result of climate change, opening the D-1 lands to development may well stress fish and wildlife populations enough to jeopardize the resilience of Alaska Native communities, and other people who rely on hunting, gathering, and fishing for their well being	See response to comment 2571-1.	N
5243-1	Vicki Olds		Alaska's BLM D-1 lands support an abundance of biodiversity found in very few places remaining, globally. Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds. With "GLOBAL WARMING" and in a region experiencing FOUR TIMES the rapid ecological fluctuations due to climate change, opening the D-1 lands will stress the biodiversity overall, including fish and wildlife populations -- negatively impacting the resilience of natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing TRADITIONS. I say NO. PLEASE, I urge you to retain the D-1 protections on all 28 million acres under review.	See response to comment 2571-1.	N
5250-1	Sharon Morris		Alaska's BLM D-1 lands support an abundance of biodiversity found in very few places remaining globally. Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and affect important salmon streams that nourish entire watersheds. In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions. I strongly request that you retain the D-1 protections on all 28 million acres under review. With so many future uncertainties, it makes good sense to take a precautionary approach to public land management by preserving our Nation's last best places for future generations.	See response to comment 2571-1.	N
58-2	Matthew Sheaffer	Alaska Wilderness League	What should be the focus of debate is how Alaska plans to protect the subsistence of wildlife and preserve the tribal security.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N
6019-1	Evelyn Hao		Lifting the D-1 protections and opening the lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds and impact important salmon streams that nourish entire watersheds. In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	See response to comment 2571-1.	N
6046-1	Nancy Garret		Lifting the D-1 protections and opening BLM D-1 lands to industrial development would fragment some of our last remaining intact landscapes, affect migratory corridors for large mammals and birds, impact important salmon streams that nourish entire watersheds, create more stress on fish and wildlife populations, and jeopardize Alaska Native communities, and hunting, gathering, and fishing traditions. D-1 protections on all 28 million acres under review is vitally important in order to preserve our Nation's last best places for generations to come.	Effects to subsistence resulting from development and a loss of Federal subsistence priority are described in EIS Section 3.14.1.2.2, EIS Section 3.14.2.2.2, and EIS Section 3.14.3.2.2, Impacts Common to All Action Alternatives.	N

Subsistence					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
62-1	Christine Reilly		If the status is changed, it could disrupt caribou migration routes and impact salmon habitat, all of which are important to the locals who live there and negatively impact the tribes in the area. One big development would start a cascade of negative effects on the environment.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	N
6755-1	Nina Krosch		In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will jeopardize natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions. I urge you to retain the D-1 protections on all 28 million acres under review.	See response to comment 2571-1.	N
76-1	Simona		As a pediatrician, I know that what kids eat influences their health not only now, but for the rest of their lives. Practicing in Bethel and serving children from around the YK delta, we discuss that subsistence is the healthiest thing families can do for their nutrition- particularly when store-bought food in this area tends to be expensive and processed. Constructing a mine on the Kuskokwim will jeopardize this life sustaining measure for these communities, as run off from any sort of accident would affect countless individuals downstream. We can't eat, breathe or drink money. The health of children would be directly threatened by not only the Donlin gold mine, but the domino effect of opening these lands for development.	Effects on subsistence resulting from development, including potential contamination of waterways and vegetation, are described in EIS Section 3.14, Subsistence. The act of revoking 17(d)(1) withdrawals would not permit construction of a mine. Any potential future proposed mine would have to be evaluated under a separate project-specific environmental review.	N
843-1	Jim Schmidt		In a region experiencing four times the rapid ecological fluctuations due to climate change, opening the D-1 lands will also create more stress on fish and wildlife populations and jeopardize the resilience of these natural systems that support vital subsistence resources, Alaska Native communities, and hunting, gathering, and fishing traditions.	See response to comment 2571-1.	N
9618-1	John MacDonald		the lands in question are crucial to the Alaska natives who use them to provide cultural enrichment and to harvest the majority of their nutritional needs. Any resource extraction development will most certainly adversely impact their ability to feed themselves and their families.	Effects to subsistence access, resource availability, and resource abundance resulting from increased development are described in EIS Section 3.14, Subsistence.	N
9816-2	Gisela Chapa	Seward Peninsula Subsistence Regional Advisory Council	Subsistence users in the Seward Peninsula will be highly impacted by BLM's decision on whether to maintain the D-1 protections. D-1 lands support large contiguous landscapes and the fish and wildlife habitat needs for species migration and adaptation to our rapidly changing environments. Communities that depend on caribou, salmon, moose, and other subsistence resources are already encountering reductions in populations. In some regions, subsistence harvesters are being asked to harvest less to preserve species. As environmental changes continue to increase pressure on resources, we believe it is in the public interest to protect intact lands and pristine waters as a precautionary and preventative approach to resource decline.	See response to comment 14700-1.	N
9818-1	Nathan Baring		These are lands that Alaska Natives have practiced subsistence on since time immemorial. The State of Alaska has been in an all-out, long-drawn attempt to systematically undo the subsistence protections promised in the Alaska National Interest Lands Conservation Act (ANILCA) since it was passed and since Alaska fell out of compliance with Federal law regarding subsistence at its own willful violation. The State of Alaska would rather that subsistence was not prioritized anywhere in Alaska, just as it callously disregards it on state and private lands under management. This attempt to open traditional lands at issue to resource development may, on its own, be unjustifiable as a reason to withdraw Federal protection, but it enters an additional layer of cynicism when considering the state's unending mission to disregard subsistence protections for Alaska Natives and anyone else.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority are described in EIS Section 3.14, Subsistence.	N
9856-1	President Frank Katchatag	Native Village of Unalakleet	Most Alaska Native people are impacted by the BLM's land management planning decisions. BLM-managed lands support important subsistence resources and underpin food security for thousands of Athabaskan, Aleut, Dena'ina, Inupiat, Yu'pik, and Tlingit peoples. For Alaska Native communities off the road system, over 80% of food consumed comes directly from the surrounding lands and waters. A tribal member from the village of Anvik on the lower Yukon River said it well, "We don't own the land, but we belong to the land and whatever happens to the land happens to us."	See response to comment 13139-1.	N
9998-1	Dean Barlip		So last year was a -- was a bad hunting year for everybody. So there was very few moose taken. And so shrinking those lands are going to be less mistaken and less chances for the people who live subsistence lifestyles and who depend on a chance of getting moose. The moose population, caribou population, everything's decreasing over the last decade. And so shrinking these lands means less chances for -- for those people to get a moose or a caribou.	Effects to subsistence resulting from a loss of Federal subsistence priority, including increased competition and decreased harvest success, are described in EIS Section 3.14, Subsistence.	N
F2-1	-		Tribal members and non-native Alaskans alike hunt, fish and trap for subsistence on any of the D1 lands. That means food on the table, and some money in the pockets of many Alaskan residents. For communities off the road system, over 80% of their food is from the lands and waters abounding them. This is a food security issue.	Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development are described in EIS Section 3.14, Subsistence.	Y

Tribal and Government-to-Government Consultation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
10058-2	Raymond Oney	Yukon-Kuskokwim Delta Subsistence Regional Advisory Council; Yukon-Kuskokwim Delta Subsistence Regional Advisory Council	The Council would additionally like to let BLM know our concerns about how our Council was made aware of this issue and the accompanying opportunity for public comment on this topic. BLM did not notify the Council of this issue prior to our fall 2023 meeting; a non-governmental advocacy organization informed us. We should have been notified directly by BLM about the forthcoming ANCSA 17(d)(1) Withdrawals DEIS given the significance of this issue and its potential impacts to subsistence, as well as our Council's authority under ANILCA. We do thank BLM staff for agreeing to present on this issue to our Council at our fall 2023 meeting after we found out about it from other sources. However, in the future, we request that BLM directly notifies affected Subsistence Regional Advisory Councils of all upcoming and open public comment periods so that we may exercise our Council's authority under ANILCA to review and make recommendations on plans and proposals that have impacts to subsistence. It is particularly important that we receive timely notice of issues such as this one because we are chartered under FACA and we must conduct all our business in a public forum. We cannot elect to submit comments as a Council except during our biannual meetings. Further, even after BLM staff presented to us on this issue and notified us there would be an upcoming public comment period, the Council never received notification from BLM when the comment period actually opened. Again, we had to rely on other organizations and our Coordinator to make us aware.	See response to comment 14100-1.	N
13379-1	Alex Whiting	Native Village of Kotzebue	In our comments on these prior actions, we have drawn the attention of BLM to the lacking outreach process and have also strongly suggested creating an email list-serve to send notices of BLM actions out to Tribes in a timely manner for them to be aware of and participate in. This current process still shows the need for improvement in Tribal communication, since all of our initial information on this action came from Non-Governmental Organizations, or other third parties. Additionally, and quite concerning, the Tribe was not even aware that the 2021 Public Land Order 7899 action even occurred, until being made aware of it under this current action. We are fortunate that the process underlying PLO 7899 was deficient and required rescinding of the Order, since it was enacted without our knowledge and review /comment opportunity. Additionally, BLM was deficient in Tribal outreach on the scoping process resulting in this current DEIS, this is obvious if considering the number of Tribes engaging on this DEIS compared to the number and geographic representation of Tribes from the scoping process. This was not the result of a recent interest from Tribes (including ours), but because this current action received way more publicity, much of which was from third parties and Tribes themselves. This demonstrates our point that the BLM really needs to take seriously their obligation to inform Tribes of actions they are undertaking that would likely impact Tribal interests and Tribal citizens, which PLO 7899 would certainly have done. Besides the obligation to Tribal Governments, BLM has an obligation to protect subsistence uses and opportunities under ANILCA Section 800's. So, we again request that BLM assess the efficacy of its Tribal communication and outreach processes.	See response to comment 14100-1.	N
14043-1	Erin Dougherty Lynch	Native American Rights Fund on behalf of the Bering Sea Elders Group	Under ANCSA, the Secretary of the Interior must evaluate whether the D-1 protection should remain in place to protect the public interest. In addition, all federal agencies have a trust responsibility to Tribes and must engage in government-to-government consultation when making decisions that may impact our tribal communities. Recent guidance also reaffirms the BLM's obligation to ensure an "integral role" for Tribes in the agency's decision-making and recognizes the benefit of incorporating Traditional Knowledge and tribal expertise in federal land management.	See response to comment 14100-1.	N
14056-2	Theresa Kobuk, Gilbert Tocktoo, Dolly Kugzruk, Doug Katchatag, Axel Jackson	Native Village of St. Michael Tribal Council; Native Village of Brevig Mission Traditional Council; Native Village of Teller Traditional Council; Norton Bay Watershed Council; Native Village of Shaktoolik Tribal Council	Partnering with tribal entities in analyzing climate impacts on critical fishery habitat that may be impaired by mining and other development on public lands is consistent with former President Clinton's Executive Order 13175 which directs such agencies to "establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications" and to "respect Indian tribal self-government and sovereignty, honor tribal ... rights, and strive to meet the responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments." Additionally, President Obama issued a November 9, 2009, Memorandum to the Department Heads as an agency directive to implement EO 13175.3 Finally, in January 2021, President Joe Biden issued a memo: "seeking to implement Executive Order 13175, which directed all executive departments and agencies with engaging in regular, meaningful, and robust consultation with Tribal officials in the development of Federal policies that have Tribal implications. The departments and agencies are directed to prepare and update detailed plans of actions to implement the order." Partnering with Alaska tribal organizations in developing adequate NEPA analysis for the EIS is also consistent with the Office of Science and Technology, Council on Environmental Quality,	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals and would not make decisions on a particular resource. Withdrawal revocations would not preclude co-stewardship agreements between the BLM and Tribes in the future.	N

Tribal and Government-to-Government Consultation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			<p>Memorandum for the Heads of Departments and Agencies Elevating Indigenous Knowledge in Federal Decision Making, and the Department of Interior's Guidance to Strengthen Tribal Co-Stewardship of Public Lands and Waters.</p> <p>We suggest that the process for collaboration with the NBWC to adequately address the climate analysis in the D1 lands EIS process be conducted through coproduction, which is a highly effective approach to producing actionable science through collaboration between researchers, scientists, specialists, planners, managers, and related stakeholders to inform policy and management decisions. Actionable science includes data, analyses, syntheses, projections, and tools that can support resource management decisions. Coproduction is a process that both requires and fosters development of strong working relationships. The level of collaboration can vary widely depending on the nature of individual projects.</p>		
14100-1	Sarah Lukin, Ethan Tyler	Cook Inlet Region, Inc. (CIRI); Cook Inlet Region, Inc. (CIRI)	<p>Need for consultation with Tribal officials or Alaska Native Corporations: BLM has not met its obligation to consult with Tribal entities and Alaska Native Corporations (ANCs) regarding its decision on the withdrawal of ANCSA 17(d)(1) lands. The decisions made because of this process will impact the management of thousands of acres of public lands across Alaska and within the Cook Inlet region. BLM is required by law and Department of Interior policy to consult with and engage CIRI and other Tribal entities early in the decision-making process. Such consultations ensure that the important perspectives, rights, and interests of Alaska Native people are taken into consideration when making significant decisions regarding land management policy.</p> <p>The proposed alternatives have significant impacts on the land and subsistence rights of Alaska Native people across the state and should not be entered into without proper consideration with Tribal entities and Alaska Native corporations.</p> <p>CIRI requests consultation with BLM to better understand the implications of the proposed alternatives to CIRI land entitlements, Alaska Native Veteran allotments, CIRI stakeholders, and the statewide implications of these actions on Alaska Native people.</p>	EIS Section 1.8.1, Consultation with Tribes and ANCs, describes the BLM's efforts to engage in government-to-government and ANCSA consultations.	N
14167-5	Olivia Karns	Tanana Chiefs Conference	<p>The ANCSA (d)(1) lands analysis has progressed during a phase of related BLM planning activities, namely the Public Lands rule-making process. TCC provided comments on several thematic subjects in the proposed rule process that seeks to modernize BLM management policies. There are several provisions in the Public Lands rule-making process that reference multiple opportunities to improve land and resource management of intact landscapes across Alaska. An emphasis is given to building relations with Tribal governments as a means by which to improve land management and wise decision-making over lands that are important to Tribes. The vision on incorporating observations, knowledge and insights by citizens of rural villages into BLM decision-making processes is highly relevant to ANCSA (d)(1) lands. Most relevant at the moment is the public testimony in hearings that universally supports the no action alternative. With adoption of the no action alternative, BLM can further advance their management objectives in collaboration with Alaska Native Tribes over the domain of ANCSA (d)(1) lands. Concerning the ANCSA (d)(1) lands, the Public Lands rule-making process offers a multitude of opportunities for collaborative management of lands and resources, including novel adaptive management procedures. Comments provided by TCC emphasize the need for BLM to recognize lands important to Tribes and enter into co-stewardship arrangements with Tribes in their traditional use areas. An important tool for advancing co-stewardship is the statutory land classification requirement of identifying areas of critical environmental concern, or ACECs. Through the public involvement process for the Bering Sea Western Interior RMP process, many Tribes attempted to notify BLM of lands important to them as ACECs, but the agency categorically denied those nominations in a grossly arbitrary manner. Consequently, TCC provided comment in the Public Lands rule-making process advocating that the BLM adopt an Alaskan specific concept of recognizing lands important to Tribes as an ACEC subgrouping named areas of cultural concern that could guide the agency in their outreach and management of those lands. The no action alternative for ANCSA (d)(1) lands environmental review will provide the agency discretion to incorporate the modernized land rules and apply those to emerging land management challenges on landscape health. For large intact landscapes in Alaska, the resource management challenges include climate change forcings, the Gravel-to-Gravel salmon restoration initiative, wildland fire management and cultural resources management (see below). Any alternative other than the no action alternative is premature for the collaborative interest of long-term monitoring and adaptive management practices that contribute to wise management of ANCSA (d)(1) land holdings.</p>	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals and would not preclude opportunities for co-stewardship of BLM-managed lands in the future.	N
14512-1	Josie Hickel		<p>BLM has not met its obligation to consult with Tribal entities and Alaska Native Corporations (ANCs) regarding its decision on the withdrawal of ANCSA 17(d)(1) lands. The decisions made because of this process will impact the management of thousands of acres of public lands across Alaska and within the Chugach region. BLM is required by law and Department of Interior policy to consult with and engage Chugach and other Tribal entities early in the decision-making process.</p>	See response to comment 14100-1.	N

Tribal and Government-to-Government Consultation					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			Such consultations ensure that the important perspectives, rights, and interests of Alaska Native people are taken into consideration when making significant decisions regarding land management policy.		
14578-2	Kim Reitmeier	ANCSA Regional Association	We would also like to ensure that consultation with Alaska Native Corporations is being conducted per federal law and reaffirmed through Presidential memorandum. We provide the attached email addresses (List 1) for our member organizations to facilitate consultation with Alaska Native regional corporations, who would be affected by the EIS.	See response to comment 14100-1.	N
14589-1	1st Chief Chevak Native Village	Chevak Traditional Council	The agencies need to come out to the Tribes and inform them of their intentions.	See response to comment 14100-1.	N
14842-10	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	Chilkat Indian Village (CIV) is a federally recognized tribal government within the ROFRMP region. CIV has been in communication with BLM regarding the ROFRMP and the Haines Amendment for many years. If BLM decides to lift D1 withdrawals from the lands in the region, it would prevent further opportunities for government-to-government discussions about co-stewardship of these lands, which was identified as a Department of Interior priority in Joint Secretarial Order 3403.19 More specifically, the D1 lands in the Haines Amendment region encompass some lands currently leased for federal mining claims that were established prior to ANCSA. CIV is currently consulting with the US government on how to steward these lands to prevent large-scale mining development. Removing D1 withdrawals would limit the ability of impacted Tribes to engage with the US government on these issues.	A decision by the Secretary to revoke or partially revoke the withdrawals would not affect the ability of the Tribes and the Department of the Interior to pursue co-stewardship opportunities. All the lands in the Haines region within the decision area are already selected by the State of Alaska and could be conveyed at any time, regardless of the Secretary's decision.	N

Vegetation, Wetlands, and Special Status Plants					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13211-6	Caitlin Roesler	US Environmental Protection Agency Region 10	EPA appreciates that the DEIS acknowledges the connection between the health of water resources and the health of aquatic subsistence resources. Reasonably foreseeable development scenarios resulting from all three action alternatives would result in impacts to wetlands, which the DEIS explains "are regulated under Section 404 of the CWA, which requires authorization from the USACE [US Army Corps of Engineers] to place fill in waters of the United States, including wetlands." EPA appreciates the DEIS including information about the CWA SS 404 process as a reasonably foreseeable next step. For further public transparency, EPA recommends that the FEIS include additional information about the CWA SS 404 process so that the public is aware of potential future opportunities to engage on projects resulting from withdrawal revocations. Reasonably foreseeable future projects (e.g., mining exploration and development) could require a CWA SS 404 permit from the USACE for the discharge of dredged or fill material into waters of the United States, and the USACE is required to conduct a NEPA analysis when issuing permits. The public may have further opportunities to engage after this EIS process on reasonably foreseeable site-specific projects. In addition, EPA recommends that the FEIS Executive Summary include acreages of wetlands likely to be impacted from DEIS Tables 3.17-2, 3.17-3, and 3.17-4.	The EIS discloses that projects with Federal permits or funding would undergo project-level environmental review and permitting. Detailed description of the Clean Water Act Section 404 permitting process is beyond the scope of this analysis. The EIS Executive Summary Table ES-1, Summary of Impacts, is a summary; it does not list details of every impact described in the EIS. Details of wetland impacts are provided in EIS Section 3.7, Fish and Aquatic Species, and EIS Section 3.17, Water Resources.	N
13776-2	Linda Rutledge		The Rutledge family has lived at Mile 3, Edgerton Hwy for 44 years. Our homestead is shown in the draft State of Alaska Copper River Basin Area Plan revision. Our homestead borders BLM lands that the State of Alaska has selected for ownership. In the Area Plan they are proposing this land for settlement and agriculture (H-51A Se and H-51B Se Ag). The Copper Basin Area Plan, chapter 3-2, states: Se settlement "this designation applies to State uplands suitable for sale." These lands do not qualify as uplands. They consist of lowlands, wetlands/muskeg and permafrost. Attached are maps and text that show why keeping this wetland corridor intact is important. I have also shared this information with the DNR planning team for their evaluation.	The BLM-managed lands adjacent to the State parcel described in the comment are 17(d)(1) withdrawals included in the decision area of the EIS. Effective selections are segregated; if effective selections are conveyed out of Federal management, they would no longer be under the BLM's jurisdiction. For the purposes of this analysis, high value habitats were broadly assigned and align with high value wildlife habitats, which include wetlands. If a withdrawal is revoked, any potential development would undergo project-specific environmental evaluation. High value wetlands and important wildlife corridors would be identified during the project-specific permitting process and suitable mitigation (if applicable) would be developed. In addition, no known housing or agricultural development projects were identified as planned actions in EIS Table 3.1-6, Reasonably Foreseeable or Planned Actions in or Near the Decision Area.	N
14641-35	Hallie Templeton, Chief Gary Harrison, Sue Mauger, Cooper Freeman, Anaan'arar Sophie Swope,	Friends of the Earth; Chickaloon Native Village; Cook Inletkeeper; Center for Biological Diversity;	Relatedly, the DEIS fails to address the important role wetlands have in providing buffers from erosion and pollution absorption. BLM acknowledges wetlands make up 43.3% of Alaska's surface area (ADFG 2023) and are typically associated with important wetland function, including flood flow attenuation and storage, erosion control, groundwater recharge, organic matter production	See response to comment 13379-5.	N

Vegetation, Wetlands, and Special Status Plants					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
	Doug Katchatag, Tim Bristol, Dan Ritzman, Vicki Clark, Emily Anderson, Bonnie Gestring, Charisse Arce, Patrick Lavin, David Krause	Mother Kuskokwim Tribal Coalition; Norton Bay Watershed Council; SalmonState; Sierra Club; Trustees for Alaska; Wild Salmon Center; Earthworks; Earth Justice; Defenders of Wildlife; Audubon Alaska; Alaska Wilderness League	and export, and pollutant absorption.179 However, BLM fails to analyze how the existing 35 million acres of intact wetlands in the analysis area180 could serve as an important buffer to climate change impacts.		
3088-1	Elizabeth Root		The preservation of all of our old growth forests is among those of highest priority. They are vital in storage of carbon and their ecosystems are home to many vanishing species.	Old growth forest habitat was included in the list of high value habitats analyzed in the EIS, as described in EIS Section 3.2.1.1, Affected Environment, first paragraph.	N
14842-1	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	We understand land-use restrictions cannot be transferred to the State, but for all other Federal lands administered by a BLM Resource Management Plan (RMP), we recommend ensuring conservation measures are included to help protect the environment. Best management practices (BMPs) often proposed by various agencies may mitigate some impacts, but often permanent impacts to the system result. We are concerned that the Reasonable Foreseeable Development (RFD) proposed in the DEIS will result in substantial permanent multi-watershed wide impacts despite standard minimization measures due to incomplete mitigation coverage, historical practices, incomplete analysis of impacts, and the widespread use of "as practicable" within permit stipulation language.	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals; she will not make management decisions for resources, thus the suggestion is outside the scope of the EIS. Mitigation or monitoring would be considered at the project-specific level when a specific project is evaluated under its own separate project-specific environmental review.	N
14842-4	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	We recommend the BLM include literature and/or public data searches that have information on successful project-specific remediation to compare with activities that are assumed to be associated with the RFD in Alaska. Until that information can be obtained and assessed for the risk of failure, the Service is concerned adequate restoration will not occur and systems will not meet minimum restored function standards, resulting in significant permanent impacts. For example, the DEIS states "Future remediation and restoration of past mining activities may improve water quality [...] and mitigate 303(d) impaired waters." The Service would like clarification of when these efforts will happen.	Evaluating effectiveness of past restoration on reclaimed mines is outside the scope of the EIS and is not necessary for a reasoned choice between alternatives. Any future approval of plans of operations would be subject to separate project-specific environmental review.	N
14842-5	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	The Service is concerned the potential impacts of introduction and subsequent spread of invasive species will be substantial and permanent, contributing to the alteration of habitat and species diversity. The BLM (e.g., Dalton HWY) and ADOT&PF (e.g., Chena Hot Spring Road 2021 - 2022 project) are examples of ineffectual management where the practices did not prevent the spread of invasive species in Alaska. While management and monitoring plans may have the best intentions, enforcement, funding, and BMP terminology like "may" be, or "if" employed when "practicable" will not effectively prevent the introduction of invasive species into the terrestrial and aquatic systems of the Action area.	The potential impact of invasive species is discussed in EIS Section 3.16, Vegetation, Wetlands, and Special Status Plants. See response to comment 14842-1 regarding monitoring and BMPs.	N
14842-14	Ryan Mollnow	U.S. Fish and Wildlife Service, National Wildlife Refuge System in Alaska	All wetlands regardless of WOTUS designation are important as habitat for Service trust resources and are considered here in their entirety. One of the more important functions of wetlands from a fish and wildlife perspective is providing diverse habitat (e.g., staging, nesting, feeding, and brood-rearing areas for birds; foraging sites for mammals; and feeding and rearing habitat for fish). Additional wetland functions include reducing flood peaks, recharging groundwater aquifers, filtering pollutants, and supporting unique plant communities that contribute to biological diversity (USEPA 2015, National Research Council 1995).	Wetlands are summarized in Section 3.17.1.1, Affected Environment, and the tables throughout the environmental consequences of Section 3.17.1, Water Quality.	N

Water Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13087-1	Stephen Richards		The Copper River Basin and drainage has enjoyed protected status since 1971, helping insulate it from damage that is inevitable with heavy industry, especially mining and forestry work. I work in support of those industries in the State of Alaska and I see first hand the damage of those industries leave behind, even with the best of intentions. The Copper River is home to one of the most commercially valuable fisheries in the State, and runs through the Nation's largest National Park. There is no reason to remove the protection from this	Potential impacts on fish from industrial development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section, 3.7 Fish and Aquatic Species. Potential impacts on water quality from industrial development are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. The potential for mine development in the East Alaska planning area, which encompasses the Copper River watershed, is discussed in EIS Appendix D, Reasonably Foreseeable Development Scenario, under EIS Section 3.4, East Alaska Planning Area.	N

Water Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			beautiful place for short term, or even long term, financial gain. Especially when that protection safeguards one of the most valuable salmon fisheries in Alaska.		
13265-1	Mary Glaves	Backcountry Hunters and Anglers	Mining activities inherently negatively affect water quality, especially where increasing erosion, sedimentation, and discharge into groundwater are happening. This causes unacceptable risks to wildlife, habitat quality, and people in communities as well as subsistence resources.	Impacts on water quality from potential mining activities that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences.	N
13340-5	Shannon Donahue	Rivers Without Borders	The ecological health and clean water of the Chilkat-Klehini Watershed bear strong importance not only locally, but regionally and globally as a potential refugium for sensitive species including all five species of wild Pacific salmon, eulachon, mountain goats, and the world's largest seasonal population of bald eagles in a changing global climate with rising surface water and atmospheric temperatures. The salmon and eulachon that are endemic to the Chilkat River, and the watershed's genetically distinct mountain goats are not only ecologically important, but also culturally and historically significant to the region's local and Indigenous communities. The Chilkat Valley's north-south orientation and transboundary watersheds serve an important function in connecting the diverse subarctic interior habitats to the north with the temperate coastal rainforest to the south, facilitating migratory corridors, supporting genetic diversity among fish and wildlife populations, and contributing to the area's unparalleled biodiversity, as well as the biodiversity and resilience of connected areas.	Impacts on water quality from development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. Potential impacts on fish are discussed in EIS Section 3.7, Fish and Aquatic Species. Potential impacts on mountain goats are discussed in EIS Section 3.15, Terrestrial Mammals. Potential impacts on migratory birds are discussed in EIS Section 3.2, Birds and Special Status Bird Species. Potential impacts associated with climate change are discussed in EIS Section 3.3, Climate. The potential for development in the Ring of Fire planning area, which includes the BLM-managed portions of the Chilkat-Klehini watershed, is discussed in EIS Appendix D, Reasonably Foreseeable Development Scenario. See also response to comment 14641-40.	N
13380-1	David Wellman		There is a series of lakes located on one of these D-1 sections a few miles up the Edgerton Highway from my home. These lakes drain into Willow Creek. If these D-1 lands upstream from us are opened for further development, we can expect to see changes almost certainly negative in nature in our downstream region of the creek. Upstream developments might include the construction of roads and driveways, which interfere with drainage; the clearing of trees, which melts permafrost; the installation of septic systems, which introduce pollutants to the watershed; and so forth.	Impacts on water quality from development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. The potential for development in the East Alaska planning area, which encompasses the Willow Creek watershed, is discussed in EIS Appendix D, Reasonably Foreseeable Development Scenario under EIS Section 3.4, East Alaska Planning Area.	N
13851-3	Margaret Stern	Susitna River Coalition	The Susitna River Coalition formed in response to the proposed Susitna-Watana Hydro Project. The site of this wildly unpopular, prohibitively expensive, and environmentally destructive project lies within the bounds of the Eastern Alaska Unit of D-1 Withdrawals. If D-1 protections are lessened surrounding Devil's Canyon and Watana Creek, entities attempting to pursue the project despite repeated anti-dam sentiment would be able to bypass checks and balances to pursue the project.	The proposed Susitna Watana Dam is identified as a reasonably foreseeable action in EIS Table 3.1-6, Reasonably Foreseeable or Planned Action in or Near the Decision Area. The proposed dam is not on Federal land and would have to be evaluated under a separate project-specific environmental review. Potential impacts of the dam on freshwater aquatic habitat and fish and aquatic invertebrate populations are discussed in under Cumulative Impacts in EIS Section 3.7, Fish and Aquatic Species. Potential impacts of the dam on the abundance and distribution of caribou, moose, and other terrestrial mammals are discussed under cumulative impacts in EIS Section 3.15, Terrestrial Mammals. Potential impacts of the dam on water quality and water availability are discussed under cumulative impacts in EIS Section 3.17, Water Resources.	N
13851-4	Margaret Stern	Susitna River Coalition	The Upper Talkeetna Watershed also has a large acreage slated for withdrawal. The Talkeetna River is a major tributary of the Susitna. The Talkeetna River is one of the Alaska state designated Susitna Basin Recreation Rivers. The Susitna Basin Recreation Rivers are identified as particularly valuable scenic and recreation rivers. While the water body proper is important, the surroundings contribute to the overall health and ecological importance of the system.	Impacts on water quality and water availability from development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2 and 3.17.2.2, Water Resources, Environmental Consequences. The potential for development in the Ring of Fire planning area and East Area planning area, which together include the Susitna River and Talkeetna River watersheds, is discussed in EIS Appendix D, Reasonably Foreseeable Development Scenario.	N
13901-2	Anonymous		Acidic mine drainage is a serious problem in many areas of former hard rock mining in the conterminous 48 states. Alaska has dealt for decades with acidic mine drainage from the Tulsequah Chief mine in British Columbia into the Taku River near Juneau and currently faces risk with Canadian mines in the headwaters of the Unuk River near Ketchikan. Five of the major hard rock mines in Alaska have a recent history of major spills or releases, most of which were fortunately contained.	See response to comment 13265-1.	N
14563-8	Michael Spindler		BLM should refine the analysis beyond anticipated impact to water quantity and thoroughly analyze potential cumulative impact to water quality from the RFDs. I believe the final EIS should include more discussion of potentially degraded water quality from increased extractive development such as hard-rock and placer mining, and their supporting transportation corridors. It does not matter to the fish or the water quality whether the increased mining activity occurs because lands were conveyed to the State of Alaska or because the Federal lands see more mining activity once restrictions to locatable and leasable mineral development are lifted with the revocations. I am concerned that this DEIS does not adequately address the long-term consequences of mining development to water quality, and hence fish and subsistence. I found it paradoxical that BLM quite accurately concluded from the scientific literature reviewed for the Ambler Road DSEIS: "Impacts on water resources quality may include increased dust from mining operations, potential spills, and containment of ore concentrates, chemicals used in	Impacts on water quality from mining development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. Discussion of reasonably foreseeable mining development that could impact water quality is in EIS Section 3.17.1.2.7, Water Resources, Cumulative Impacts. Impacts of mining on fish are discussed in EIS Section 3.7, Fish and Aquatic Species. A description of areas more likely to be developed (and thus more likely to impact water quality) is in RFD Section 3, Locatable Minerals, in EIS Appendix D. As described in EIS Section 3.1.1, Analysis Methods and Assumptions, there remain implications that are unknowable on an individual parcel-by-parcel level should the Secretary revoke the 17(d)(1) withdrawals. These include the levels and timing of development that could occur far in the future on an individual parcel-by-parcel level.	N

Water Resources					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			processing ore, fuels, and process water, in addition to wastewater from operations of facilities and camps, and may require treatment of mine water in perpetuity (BLM 2023b p. 3-44); and, "Direct and indirect chemical stressors such as mining related pollution, acid mine drainage, and the release of toxic materials have the potential to impact the health and survival of fish populations and other aquatic species [Limpinsel et al. 2017] (BLM 2023b p. 3-105). The final D1 EIS should include a similar detailed level of scientific literature summary to accurately describe how expanded D1 revocations in Alternatives C and D could increase potential long-term, cumulative impacts to fish and water quality, mainly due to the RFDs of increased mining. It is well known across North America that potentially severe mining impacts, particularly acid rock drainage and heavy metal leaching from tailings and waste rock disposal, are unavoidable, difficult to mitigate and often require perpetual treatment (Limpinsel et al. (2018), Woody and O'Neal (2020), and Sergeant et al. 2022). I believe the final D1 EIS should disclose the established poor water quality track record of large mines in the US (Maest et al. 2006), and specifically in Alaska (Earthworks 2020) because it is more likely, than not, that this record will extrapolate into the revocation areas in the future. It is questionable that current regulations and policies on the State or Federal side will be able to do an acceptable job of avoiding these long-term impacts (Sergeant et al. 2022). I believe the distinction in the D1 DEIS of whether future mining occurs on lands that get conveyed to the State (and managed under DNR and DEC regulations) or lands that remain as Federal multiple use (under the 1872 mining act, and BLM Mining Handbook (2012) is not as important as providing estimates of the aera extent of potential future hard rock and placer mines, and estimation of their impact to water quality. I do not agree with the caveat about mining impacts to water using the large qualifier "...it would be too speculative to try to describe the details of such change..." (3-86 and 3-95 fish, p. 3-70, 3-98, 3-106, 3-112 minerals, 3-179 subsistence. This seems like an excuse to not thoroughly analyze the most difficult aspects of mining impacts to water and fish over the huge area potentially covered by D1 revocations. As pointed out above, the long-term consequences to water and fish from D1 revocations that enable several new large hard rock mines, or placer mining operation over an extensive area, should be better quantified. It does not matter whether that occurs on lands that ultimately become State-owned or remain under federal mineral management regulations; they should be analyzed equally.	As per 40 CFR 1502.2, "reasonably foreseeable future actions do not include those actions that are highly speculative or indefinite."	
14572-3	Barry Santana		Drainages could be destroyed if a significant mine tailings pond fails or inadequate water treatment for acid bearing rock, copper, selenium and other minerals if it occurs over time.	See response to comment 13265-1.	N
14655-1	Karmen Monigold		When you look at the (d)(1) lands they're hitting our waterways, the Noatak River, the Kobuk River, Buckland -- Buckland area would be hit hard. And I doubt very many people in Buckland even know this is coming down the pipes. Upriver -- and these rivers flow right to Kotzebue. So any toxins of any which way direction, if they have a mine or start development or build a road -- would affect Kotzebue and the resources that we rely on.	Impacts on water quality development that may occur as a result of revoking 17(d)(1) withdrawals are discussed in EIS Section 3.17.1.2, Water Resources, Environmental Consequences. The potential for development in the Kobuk-Seward Peninsula planning area, which includes BLM-managed portions of the Noatak River, Kobuk River, and Buckland River, is discussed in EIS Appendix D, Reasonably Foreseeable Development Scenario.	N
14681-22	Emily Johnson	National Park Service	The Alagnak River is a Wild and Scenic River which, under Alternative D, would be bordered on both banks by broad swaths of fully revoked lands. These lands drain directly to the river, separated by a narrow buffer (see tab labeled "Screenshots"). NPS requests that BLM analyze direct and indirect impacts to the Alagnak's miles of braided habitat or make its analysis more clear. A statement on p. 3-295 suggests it hasn't happened yet: "Three national wild and scenic rivers are in the analysis area." The Alagnak does not cross the boundary of the fully revoked lands, however as a Wild and Scenic River, it would be impacted by any near or adjacent development.	Non-BLM-managed wild and scenic rivers were added to EIS Table 1.6-2, Issues Identified but Eliminated from Detailed Analysis. Because ANILCA 606 amended the Wild and Scenic Rivers Act to withdraw wild and scenic river corridors (the area within 0.5 mile of the river bank) from mineral entry, and because none of the withdrawals adjacent to non-BLM-managed wild and scenic rivers are top filed, any Secretarial decision to revoke 17(d)(1) withdrawals would not affect non-BLM-managed wild and scenic rivers, and they are not discussed further in the EIS.	Y
14681-26	Emily Johnson	National Park Service	Hydrology is a principal driver dictating the structure and function of all aquatic systems. In the broadest sense, hydrology encompasses the distribution and movement of water and its interactions with the surrounding environment, whether in the ground, on the landscape, or in the atmosphere. Hydrologic parameters, such as stage and discharge, affect myriad physical, chemical, and biological processes from nutrient loading to the timing and success of fish spawning. The "water availability" section did not capture the importance of hydrology as a driver. Paragraphs about water temperature (which is a water quality variable) confuse the issue. Unfortunately, very few long-term gaging stations exist in Alaska, so it's understandable why indicators for water availability match those of water quality. However, the NPS requests that BLM note the widespread lack of baseline data, rather than paint a rosy picture: "The USGS has established stations to monitor surface water quantity across the analysis area, including active stations and discontinued stations providing historic observations"	Additional discussion on hydrology and widespread lack of baseline data was added to EIS Section 3.17, Water Resources. Hydrology and water quality are closely linked; while temperature is a parameter of water quality, changes in water temperature also affect hydrologic processes as described in EIS Section 3.17.2.1 Water Resources, Affected Environment.	Y
14681-27	Emily Johnson	National Park Service	SWAN has long-term monitoring datasets on water quality, water availability (stage & discharge), wet deposition, and contaminants in resident fish. NPS has included sources for BLM to consider to strengthen analyze impacts to water quality, water availability, wet deposition, and contaminants in resident fish. NPS would work with BLM as requested on this review.	Available NPS I&M data, including from SWAN, and referenced wet deposition data incorporated into EIS Section 3.17, Water Resources.	Y

Water Resources					
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			<p>Water-related time series not just for SWAN but for other I&M networks and parks around Alaska and the Lower 48 can be accessed publicly at https://irma.nps.gov/aqwebportal/.</p> <p>Wet deposition data are part of a broader monitoring network and those data can be found at nadp.slh.wisc.edu/networks/national-trends-network/. The site we operate, AK97, is one of only a handful in the state. It's located in King Salmon, AK.</p> <p>Contaminants in resident fish data are spread across a couple websites, representing both short-term research and long-term monitoring data: DataStore - Mercury Concentrations in Resident Lake Fish Sampled from Lake Clark National Park and Preserve in 2019 and 2020 (nps.gov) DataStore - Mercury Concentrations in Resident Lake Fish Sampled from Katmai National Park and Preserve in 2021 (nps.gov) DataStore - Freshwater Contaminants - baseline data before protocol (nps.gov) Assessment of mercury sources in Alaskan lake food webs (ver 1.1, September 2023) - ScienceBase-Catalog</p>	<p>National Atmospheric Deposition Program (NADP). 2023. National Atmospheric Deposition Program 2022 Annual Summary. Wisconsin State Laboratory of Hygiene, University of Wisconsin-Madison, WI.</p> <p>National Atmospheric Deposition Program (NADP). 2024. NTN Interactive Map. Available at: https://nadp.slh.wisc.edu/maps-data/ntn-interactive-map. Accessed March 6, 2024.</p> <p>National Park Service (NPS). 2020. Water Quantity. Anchorage, Alaska: NPS Southwest Alaska Network. Available at: https://irma.nps.gov/DataStore/DownloadFile/637872. Accessed March 6, 2024.</p> <p>National Park Service (NPS). 2024b. NPS Continuous Water Data. Available at: https://irma.nps.gov/aqwebportal. Accessed March 6, 2024.</p>	
6301-1	Lawrence Rinder	Alaska Wilderness League	<p>I am writing to strongly oppose revocation of the ANCSA 17(d)(1) Withdrawals. If revoked and if these lands become open to mining and other industrial activity it will have an extremely negative effect on many rivers and streams, especially the Copper River. The Copper River provides an essential resource for the economy, livelihood, and spiritual traditions of the native people of Prince William Sounds. It is essential for the fishery. I strongly oppose revocation of the ANCSA 17(d)(1) Withdrawals.</p>	See response to comment 13087-1.	N
9515-1	Michelle LaRose	Curry Ridge Riders Inc. of Trapper Creek	<p>Concern and reconsideration is needed for the drainage into our waterways that may result in the release of D1 lands for mining and tailing by-products that pollute waterways and affect all aquatic life as the result. Most of Alaska's remote wilderness has drainage with estuaries into larger waterbodies (such as the Susitna River for example). Ecological impacts to such waterbodies will change the ecosystem permanently.</p> <p>Commercial purposes for extraction of minerals and thus mining should not include significant impacts to our major watersheds as close as some of the D1 tracts are being considered for release now.</p> <p>Please be wiser about releasing eco-sensitive public lands to commercialization of any sort by redrafting this plan with more sensible conservation considerations.</p>	See response to comment 13265-1. Additionally, Alternative A and B protect high value watersheds (see EIS Section 3.7.1.2.3, Fish and Aquatic Species, Alternative B).	N

17(d)(1) Withdrawals and Land Status					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
13587-1	George Guy	Kwethluk, Incorporated	<p>As majority of village corporations are still not fully cadastral surveyed of our lands to acquire title and patents, the referendum will devastate our subsistence way of life through our customary and traditional subsistence rights under ANILCA title VIII through the removal of ANCSA 17(d)1,</p>	See response to comment 14052-3.	N
13984-8	Chief Gary Harrison	Chickaloon Native Village	<p>If BLM chooses to 'dispose' of the lands, these lands should be conveyed back to the Indigenous Peoples who stewarded these lands since time immemorial. The lands should not be conveyed to the state or other entities. Chickaloon Native Village has serious concerns about BLM conveying lands to the State of Alaska. First of all, some ANCSA Village corporations have not selected all of the acres they are permitted to select, so the BLM should not convey more lands to the state when ANCSA Village corporations have not completed this process to its fullest extent. Additionally, there remain ANCSA Village corporation land selections that have not been conveyed by BLM to the Village corporation. It is completely inappropriate for BLM to convey more land to the State of Alaska, when ANCSA Village corporations have not received their complete selections.[Note: Kings River and Chickaloon River have been selected by Chickaloon Moose Creek Native Association but never conveyed AND at least one of these ANCSA Village corporation selected parcels on the Chickaloon River is color coded red in the BLM DEIS for "area more likely to be developed" due to minerals.] Lastly, the State of Alaska has repeatedly denied permits to Chickaloon Native Village for cultural resources studies on state lands, so there should be no further lands conveyed to the state without inherent involvement of Tribal governments and cultural resource surveys with engagement of the Tribal governments.</p>	See response to comment 14052-3 for a discussion of ANC conveyance regarding the Secretary's decision and the method under which underselected Native corporations can receive land.	N

17(d)(1) Withdrawals and Land Status					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
14052-2	Tisha Kuhns	Calista Corporation	INCORRECT STATEMENT IN THE DRAFT EIS THAT ANCSA SELECTIONS ARE IN PLACE The Draft EIS states that "ANCSA selections are in place." This is not factually correct. Calista and other ANCs have large statutory land entitlements that have not yet been conveyed. Much of these land entitlements have not been selected yet, no less withdrawn or otherwise segregated. The only way to assure a sufficient acreage of federal land remains available to fulfill these statutory land entitlements is to keep it in ANCSA 17(d)(1) withdrawal status.	See response to comment 14052-3 for a discussion of ANC conveyance regarding the Secretary's decision and the method under which underselected Native corporations can receive land.	Y
14052-3	Tisha Kuhns	Calista Corporation	CALISTA'S 330 SQUARE MILES OF UNCONVEYED ANCSA SUBSURFACE ENTITLEMENT In Calista's particular case, we have still not received about 330 square miles of subsurface lands that we were promised in ANCSA over 50 years ago. Many of the 45 Village Corporations of the Y-K Region have also still not received all of their lands. Much of these unconveyed lands have not even been selected. The BLM should honor the agreements and promises made over 50 years ago in ANCSA by keeping a sufficient amount of federal land withdrawn from other uses under ANCSA 17(d)(1) to remain available to fulfill all such ANCSA statutory land entitlements.	A 17(d)(1) withdrawal, by itself, does not prevent the BLM from transferring lands to ANCs or addressing underselected villages. To date, we have conveyed over 44.3 million acres statewide pursuant to ANCSA, with approximately 1.5 million acres remaining to be conveyed and 5.2 million acres of lands transferred by interim conveyance to be patented. The BLM's ability to convey and patent remaining lands to ANCs is not impacted by the 17(d)(1) withdrawals or the status of State of Alaska selections, whether selected or top filed. In addition, the BLM's authority to resolve ANCSA underselection is not impaired by the 17(d)(1) withdrawals. If the 17(d)(1) withdrawals were revoked and State of Alaska selections become effective, the BLM would determine whether the State-selected lands are available for selection by ANCs on a case-by-case basis. Click here for current land transfer workload status: https://www.blm.gov/programs/lands-and-reealty/regional-information/alaska/land-transfer https://www.blm.gov/programs/lands-and-reealty/regional-information/alaska/land-transfer/progress-complexities .	N
14100-2	Sarah Lukin, Ethan Tyler	Cook Inlet Region, Inc. (CIRI); Cook Inlet Region, Inc. (CIRI)	Failure to address unfulfilled land conveyances under ANCSA: CIRI disagrees with BLM's focus on the 17(d)(1) withdrawals when CIRI and other Alaska Native Corporation entitlements under ANCSA remain unfulfilled. These entitlements include patents for interim conveyances, outstanding conveyances of remaining 12(c) selections and 14(h)(1) historical sites, and subsurface estate under village entitlements within CIRI's region. CIRI has 764,000 acres of interim conveyances within surveyed townships that are awaiting patents for final conveyance from BLM. Alaska Native village corporations within CIRI's region are awaiting conveyances of 47,000 acres for which CIRI is entitled to receive the subsurface estate. CIRI is currently waiting on BLM to convey five 14(h)(1) historical sites for which surveys have been completed. Finally, CIRI is still owed 33,500 acres of 12(c) entitlements for which there is not enough available land within CIRI's region. Despite repeated engagement from CIRI over multiple decades, BLM has not put forth a plan for how it intends to meet its obligations to CIRI under ANCSA or shown any meaningful progress towards fulfilling those obligations. BLM has repeatedly pointed to a lack of resources to justify these failures, yet it elected to allocate its resources to the 17(d)(1) withdrawals rather than addressing the significant outstanding entitlements owed to CIRI and other Alaska Native corporations.	See response to comment 14052-3 for a discussion of ANC conveyance regarding the Secretary's decision.	N
14267-6	Grace Singh, Tim Gilbert	Maniilaq Association	Any Action Must Prioritize Vietnam Veteran Allotment Selections and ANCSA Entitlements. ANCSA was a Congressional Action settling the Aboriginal Land Claim for Alaska Natives before the Alaska Statehood Act could take effect. Despite this important history, the DEIS wrongly prioritizes the State's top filings over completion of the ANCSA entitlements and selections by eligible Alaska Native Vietnam Veterans. Our ANCSA counterpart known as NANA, has significant concerns of their entitlement remaining unfulfilled due to the current process of the proposed withdrawal compared to the previous 17(d)(1) withdrawals under the original PLOs. The 17(d)(1) withdrawals by way of the original PLOs were implemented in compliance with Section 17(d)(1) of ANCSA. The current DEIS, with its emphasis on State top filings under ANILCA 906(e), strays from viewing 17(d)(1) withdrawals as part of the overall process toward fulfilling the settlement of Alaska Native aboriginal lands claims under ANCSA. This concern is amplified by BLM's statement that, "Some ANCs are under selected. If State top filings fall into place, the land would be segregated and would not be available for selection by ANCs that are under selected." See, DEIS 3-4. The federal government's fulfillment of our aboriginal land claims effects all Native peoples throughout the State no matter the region or entity. The fulfillment of NANA's entitlement is also concerning to Maniilaq if our Vietnam Veterans are going to have access to suitable local lands to select their allotments from. No revocation of 17(d)(1) withdrawals should occur until selections are completed by eligible Alaska Native Vietnam Veterans under the Alaska Native Vietnam-era Veterans Land Allotment Program (ANVVLAP). DEIS Subsection 3.1.1.1 Land Selection Facts and Assumption of Analysis (See, DESI 3-2 through 3-8) exemplifies the need for BLM to choose Alternative A - No Action. There are 15 "facts and reasonable assumptions" listed in this subsection that, in part or in whole, illustrate how decision-making in this DEIS is based on much speculation and too many assumptions. We suggest retaining the 17(d)(1) withdrawals until ANCSA entitlements and	See response to comment 14052-3 for a discussion of ANC conveyance regarding the Secretary's decision and the method for which underselected Native corporations can receive land. Native veterans allotments that are not already open to selection are analyzed under Alternatives C and D in the EIS. 27.8 million acres in the decision area are already open to Native veteran allotment selection.	N

17(d)(1) Withdrawals and Land Status					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
			ANVVLAP selections are complete; thereby, eliminating or reducing the instances of speculation and the number of assumptions relied on by BLM for its decision making on the 17(d)(1) withdrawals under this DEIS. We believe reducing speculation and assumptions would assist in reaching a well-founded decision regarding future revocation of the 17(d)(1) withdrawals; however, until that occurs, we join NANA in advocating for Alternative A - No Action.		
14414-9	Sarah Obed	Doyon, Limited	BLM must seriously consider how the various alternatives could impact the completion of conveyances to the State and to Doyon and other ANCs. Whether each alternative will expedite or further delay completion of these conveyances is a complex issue. The answer may also vary by region. It is far past time for the federal government to fulfill its land conveyance commitments to the State and ANCs (as well as to Alaska Native veterans). BLM must solicit and incorporate input on these issues from the State and ANCs. Doyon continues to urge BLM and the Department to do what they can to expedite the completion of these processes, and not to take actions that may result in only dragging them out further.	See response to comment 14052-3 for a discussion of ANC conveyance prior to implementing the EIS. Additionally, effective ANCSA selections are not impacted by any decision made in the EIS. The State currently has sufficient effective selections to fulfill its entitlement under the Alaska Statehood Act. In fact, it is currently overselected. The BLM does not initiate conveyance of effective State selections, unless the State requests conveyance of those lands. The BLM is ready and willing to complete the conveyance process and able to do so from the lands the State has currently has effectively selected without revoking any withdrawals.	N
14579-1	Deantha Skibinski	Alaska Miners Association	Alternative D is the only alternative consistent with BLM's 2006 report to Congress that was required by Section 207 of the Alaska Land Transfer Acceleration Act (ALTAA). In the 2006 report, BLM stated that all decisions on ANCSA 17(d)(1) withdrawals would be made through BLM's Resource Management Plans (RMPs), and their EIS processes.	See response to comment 14579-7.	N
14603-1	Tisha Kuhns	Calista Corporation	Our ANCSA land entitlement is 6.5 million acres, much of which is in or near the Bureau of Land Management's (BLM) Bering Sea-Western Interior and Bay Resource Management Plan areas. Calista has still not received approximately 330 square miles of subsurface lands that we were promised in ANCSA over 50 years ago. Many of the 45 Village Corporations of the Y-K Region have also still not received all of the lands they were promised in ANCSA. Much of these un conveyed lands have not even been selected. The BLM should honor the promises made over 50 years ago in ANCSA by keeping a sufficient amount of federal lands withdrawn from other uses under ANCSA 17(d)(1) to fulfill all such Alaska Native Corporation land entitlements.	See response to comment 14052-3 for a discussion of ANC conveyance prior to implementing the EIS.	N
14608-2	Melanie Bahnke, Vivian Korthuis, Brian Ridley	Kawerak, Inc.; Association of Village Council Presidents; Tanana Chiefs Conference	The previous administration prepared five Public Land Orders (PLOs) without engaging with the people who are most impacted by potential PLO decisions ... our Indigenous communities closest to this land. The flawed decision to advance and lift the PLO protections was also made without consideration of how lifting the D-1 protections and allowing extractive resource development could negatively affect our cultural use areas, fish and wildlife habitat, subsistence resources, hunting, fishing, and gathering rights, and food security for hundreds of communities. Under ANCSA, the Secretary of the Interior must evaluate whether the D-1 protection should remain in place to protect the public interest. We believe it is in the public interest to protect our Indigenous way of life and retain the 0-1 protections that limit extractive development.	The EIS includes a No Action and three action Alternatives that evaluate the impacts of retaining or revoking ANCSA 17(d)(1) withdrawals, including EIS Section 3.12 Social Systems.	N
14651-8	Tim Gilbert	Maniilaq Association	ANCSA was a Congressional Action settling the Aboriginal Land Claim for Alaska Natives before the Alaska Statehood Act could take effect. Despite this important history, the DEIS wrongly prioritizes the State's top filings over completion of the ANCSA entitlements and selections by eligible Alaska Native Vietnam Veterans.	As described in EIS Section 1.4, Decision to Be Made, the decision would not affect current effective selections by the State or ANCs because they could be conveyed regardless of the Secretarial decision. Thus, the analysis focuses on top filings, which would be affected by the Secretarial decision. See also response to comment 14052-3.	N
14682-2	Saagulik Hensley	NANA Regional Corporation	The EIS doesn't show whether the purposes of the original PLOs have been met by BLM, so there should be no revocation of the withdrawals until the requirements of the original PLOs have been met. And under the original PLOs the lands were, and I quote, "Reserved for study and review by the Secretary of the Interior for the purpose of classification or reclassification of any lands not conveyed pursuant to Section 14 of ANCSA." So we read this to mean that the 17(d)(1) withdrawals are in place until, at a minimum, all ANCs, Alaska Native Corporations, reach their entitlement under ANCSA, and then the remaining lands are classified or reclassified by the Secretary of Interior. It's really important for, you know, ANC's to achieve their full entitlement and that hasn't happened yet. So therefore the PLOs are not ready to be revoked, and the EIS is premature.	EIS Section 1.2, Background, describes how the purpose of the original PLOs have been met. See response to comment 14052-3	N
14682-4	Saagulik Hensley	NANA Regional Corporation	BLM should clarify the lands withdrawn for purposes of fulfilling the requirements under the Alaskan Native Vietnam Veterans Allotment Program under the Dingell Act, and whether these lands overlap 17(d)(1) lands. In other words, we're requesting BLM clarify the overlap, or not, of the PLOs for the vets allotment program, and the PLOs pertinent to the 17(d)(1) withdrawals.	The Alaskan Native Vietnam Veterans Allotment Program under the Dingell Act is described in EIS Section 1.2, Background, and EIS Section 3.1.1.6, Native Allotments Selected Under the Dingell Act. Native allotment selections that are filed on available State selected lands would require the State of Alaska to relinquish their selection in favor of the veteran allotment selection should withdrawals be revoked. The EIS also evaluates the opening of an additional 817,000 acres to selection by Vietnam-era veterans.	N

17(d)(1) Withdrawals and Land Status					
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14733-1	Melanie Brown		And I also wanted to speak to the lands adjacent to the Alakanuk River, the (d)(1) lands, and that I've been fed from those lands because of the moose hunts that my dad has gone out there with my relatives from Naknek and beyond. And the reason that I was bringing up what I was about the interactive map is because I wanted to see what lands the state had selected that could potentially be impacted if they were if the withdrawals were revoked. And I don't know what level of priority the lands were, but I was very concerned when I saw that there are state selected lands south of the Alakanuk, because in my mind I don't see how there's any way that that those lands being conveyed can be compatible with how that river not only feeds the people of Levelock and whoever goes there to hunt for moose or goes there to fish.	Effects to subsistence and subsistence resources are described in EIS Section 3.7, Fish and Aquatic Species; EIS Section, 3.14 Subsistence; and EIS Section 3.15, Terrestrial Mammals. Most of the ANCSA 17(d)(1) withdrawals near the Levelock are not State top filed. Therefore, revocation of withdrawals in these areas would mostly return the withdrawals to BLM management under their respective RMP.	N
14750-1	Ann Shankle		I pretty much what other people are saying is I would hate to see more lands turned over to the state just to go to development, particularly mining. They could really change this area, and the lifestyle we have here, and the pristine environment we have here. So I hope as little as possible can be turned over to the state. And we've been fighting for a long time to keep mining out of here.	See response to comment 14267-2.	N
14756-1	Andrea Gusty	Kuskokwim Corporation	Today TKC has more than 9,500 acres of land to manage, and more than 4,300 shareholders. While TKC has received all of our land entitlements, among all Alaska Native corporations there still remains 1.2 million acres to be patented. Those selections have been made but have not been handed over as of yet. Their communities have no path to expansion and infrastructure because they cannot manage their own lands. As stated in the EIS as stated in this presentation the EIS only makes assumptions about state selections and patents, and ignores these remaining entitlements to ANCSA Native Corporations. We urge BLM to prioritize lands to fulfill those entitlements to Native corporations as was intended by the 17(d)(1) withdrawals in the first place.	See response to comment 14052-3 for a discussion of ANC conveyance prior to implementing the EIS.	N
1802-1	Charles Clusen		I worked on the various withdrawals following the Alaska Native Claims Act and then closely on ANILCA. Many of the d-1 lands had similar values to the d-2 lands. The stated purpose of d-1 lands was that they should stay in federal management. With most .of these lands the overwhelming federal values are for careful management for their wild values (fish and wildlife habitat, subsistence, wild recreation). Some d-1 lands were put into national parks, wildlife refuges, wild and scenic rivers. Others should have been. Still today pp All of these lands should be considered for the Presidents initiative to protect 30% of the land and water by 2030.	The EIS includes a No Action Alternative that evaluate the impacts of retaining ANCSA 17(d)(1) withdrawals. Along with other related policies or strategies, the objectives of the America the Beautiful initiative to conserve at least 30 percent of America's lands and waters by 2030 have generally been considered through the range of alternatives. However, it is outside the scope of the EIS analysis to provide specific recommendations on how to implement the America the Beautiful Initiative.	N
9997-1	Paul Boos		Anyway, what I really worry about is with the addition of these we're taking away withdrawals on adjacent lands -- stretch of the Delta and the Gulkana River, which a lot of those values of those rivers, which are congressionally designated -- federally designated rivers -- a lot of their values are included in clean water, clean air, undisturbed environment, undisturbed scenery. By taking a lot of these withdrawals away those values are at higher risk.	See response to comment 14750-1 for a description of where impacts to resources are described in the EIS.	N

Out of Scope					
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10116-9	–	Alaska Wilderness League	The analysis should include discussion and recommendations for how these lands could be best managed for meeting the [administration's] 30 x 30 Conservation Goals, before transferring them out of federal management.	See response to comment 1802-1.	N
10116-12	–	Alaska Wilderness League	Subsistence Resources The DEIS should provide a comprehensive analysis of current subsistence uses and needs on these lands and lands adjacent to them. Subsistence includes cultural and social aspects of the harvest as well as the consumption of the resource. It also pertains to how and when the resources are harvested. I would urge you to revisit sections in the DEIS that purposely or inadvertently diminish the richness and basics of a subsistence lifestyle and subsistence harvest by offering "solutions" such as "dropping off totes of fish" as a substitute for not being able to successfully harvest in traditional areas or having "sport hunters in Kotzebue donate their meat from hunts" before they board the jet back to Anchorage with their antlers. Both of these suggested solutions demonstrate the a lack of understanding of Subsistence, in this DEIS. Resources and analysis from the Federal Subsistence Program, could be utilized to see where	The quoted text, or similar suggested solutions, are not in the draft EIS. Data on subsistence harvests (A) are provided in EIS Section 3.14.2.1.1, Subsistence Harvests and Participation, and in EIS Appendix G, Subsistence Technical Appendix. Competition for subsistence users in heavily populated road-connected rural areas (B) is described in EIS Section 3.14.1.1.4, Existing Conditions, and EIS Section 3.14.1.2.2, Loss of Federal Subsistence Priority. Effects to subsistence access, resource availability, and resource abundance resulting from a loss of Federal subsistence priority and increased development (C, E, F, I) are described in EIS Section 3.14, Subsistence. Existing effects of climate change on subsistence (D) are described in EIS Section 3.14.1.1.4, EIS Section 3.14.2.1.2, and EIS 3.14.3.1.1, Existing Conditions. Economic effects are described in EIS Section 3.5, Economics. Effects to customary and traditional	N

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			<p>changes and increasing pressures and availability of subsistence resources have led to changes in the Federal Subsistence Regulations in and adjacent to these 17(d)(1) Withdrawals in the past. Discussion in the DEIS should include:</p> <p>A. Data on harvests, past, present and estimates on future harvests;</p> <p>B. Addressing increasing rural resident populations and harvesting methods and how it would effect the ability to meet current and future subsistence needs;</p> <p>C. Analysis of how subsistence use and harvest may be altered if these lands are transferred out of federal management;</p> <p>D. Analysis of how subsistence areas, available subsistence resources and harvesting have been effected by current and projected climate change;</p> <p>E. How oil, gas and mineral exploration and development in and adjacent to these areas has and could effect subsistence harvest;</p> <p>F. How current and future subsistence needs, resources, harvests and regulations would be effected by transferring these lands out of federal management;</p> <p>G. Projected economic costs to rural federal subsistence users, if these lands are transferred out of federal management;</p> <p>H. Address how customary and traditional subsistence uses might be effected by this action;</p> <p>I. How access to subsistence harvest areas might be effected by this action and subsequent development of these lands if they are transferred out of federal management.</p>	<p>subsistence uses (H) are described throughout EIS Section 3.14, Subsistence, and in EIS Section 3.14.1.2.7, Cumulative Impacts.</p>	
13211-2	Caitlin Roesler	US Environmental Protection Agency Region 10	EPA recommends that BLM consider options for co-management with the impacted Alaska Native communities in the areas of the proposed action most impacted by changes to subsistence resources, akin to the co-management of Bear's Ears National Monument.	See response to comment 14378-10.	N
13406-1	Ashley Wise, Caio Poletti Romano		We are the NOLS location that brings the most profit to the organization annually, with over \$1 million in net income during our busy summer season. During that season, we hire a robust local staff, contract with multiple flight services, and bring hundreds of tourists to the Southcentral area. Our programs rely heavily on the availability of wild, non-industrialized areas, and protecting D1 lands is integral to the success and continuation of our mission	See response to comment 13406-3 regarding impacts to tourism and recreation.	N
13529-1	Thomas Ely		Ultimately the Northern Block of BLM lands in the Haines Borough should be nominated for Wilderness Designation and the Chilkat River designated as Wild & Scenic. The Southern Block of BLM lands in the Haines Borough should be annexed to Glacier Bay National Park. These designations are the best use of these lands in perpetuity.	The Secretary of the Interior has the discretion to choose any combination of revocations of 17(d)(1) withdrawals within the analyzed range of alternatives.	N
13600-3	Jen Leahy	Theodore Roosevelt Conservation Partnership	The final EIS for the D-1 withdrawals should also consider the mitigation policy and guidance to address development-related impacts to resources from public land uses, as outlined in BLM's Manual Section 1794 and Handbook 1794-1. As part of following this guidance, the SEIS should expressly account for the risk that compensatory mitigation measures may fail and identify necessary assurances and safeguards.	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals and will not make management decisions for particular resources; the suggestion is outside the scope of the EIS.	N
13625-4	Suzanne Little	The Pew Charitable Trusts	<p>Since 2019, Pew has provided technical and logistical support to the Bering Sea Interior Tribal Commission and its 38 member Tribes working to secure several key provisions in the BSWI RMP important to communities. The Commission's mission is to work in unity to protect and support the traditional ways of life in perpetuity by advocating for land planning processes and sustainable natural resource management decisions that meaningfully reflect Tribes' voices and values. As part of the BSWI RMP process, Tribes nominated several Areas of Critical Environmental Concern (ACECs) to protect critical salmon-producing watersheds, important cultural areas, and subsistence resources. Tribes requested that those nominated lands not be opened to extractive development and detailed the critical importance of these areas for subsistence resources, community food security, and a way of life. Under the previous administration, the BLM dismissed several Tribes' ACEC nominations for important cultural areas and did not afford them any protections. The Final BSWI RMP ignored Traditional Knowledge provided as part of the ACEC justifications, denied the protections Tribes requested, and went so far as to eliminate pre-existing ACECs in the region. This BSWI RMP is the first in the agency's history to be approved without a single ACEC, despite strong Tribal support for doing so. As with the other four RMPs under review, the previous BSWI RMP also recommended revoking all D-1 protections, including within the salmon producing watersheds and important cultural areas Tribes nominated for protection. Today, the only protections remaining for Tribally nominated ACECs in the BSWI area are the D-1 withdrawals, providing additional significance to the BLM's current decision.</p> <p>As soon as practicable, Pew urges the BLM to amend the BSWI RMP with a proper analysis of Tribally nominated ACECs and consider Tribally driven co-stewardship opportunities. More broadly across all of the five RMPs, we urge the agency to consider how Traditional Knowledge and special management of key areas can support the subsistence-based communities that rely on the integrity of these lands and waters.</p>	See also response to comment 12994-1 regarding the use of indigenous knowledge in the EIS.	N

Out of Scope					
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13670-1	Rachel Lord		Over 325 Alaskans participated in the creation of the 2022 Alaska Food Security Action Plan. Goal Three, Objective Two of this statewide Action Plan is to support food justice for Alaska Natives and improve Tribal collaboration and engagement. The first two strategies to meet this objective are to protect subsistence rights, and support tribal food system development (pg 32). The action alternatives within the draft EIS are in contradiction to this objective.	Along with other related policies or strategies, the objectives of the 2022 Alaska Food Security Action Plan have generally been considered through the range of alternatives in this EIS.	N
13790-6	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	Protecting both aquatic and terrestrial habitats is crucial to long-term sustainability. It is extremely disconcerting that 65% of BLM Federal Subsistence permits within Alaska are issued in the Copper River Basin (East Alaska Planning Area), yet there are no Areas of Critical Environmental Concern (ACEC) to protect these vital habitats. This is especially concerning given the current status of the Nelchina Caribou Herd, which has a management objective of 35,000-40,000 animals and has decreased from 53,500 in 2019 to 7,800 in 2023. Now is the time to establish ACECs in the Copper River Basin.	The BLM can only consider ACEC designation through a land use planning process and cannot consider ACEC designation through a different process; consideration ACEC is outside the scope of the this EIS. Withdrawals would be retained on lands with ACEC nominations in Alternatives A and B.	N
13790-7	Karen Linnell	Ahtna Intertribal Resource Commission (AITRC)	Regarding the Alaska Statehood Act and the selection process, the State was originally eligible for 100 million acres of which roughly 5 million acres remain. Revoking the 17(d)(1) withdrawals would open millions of acres to allow the State to reselect Priority 1 and 2 selections that were previously deemed invalid. There is no benefit to anyone other than the State of Alaska and their potential acquisition of previously invalidated selections. We are asking that a hard deadline be established to finalize this selection process. Concluding the conveyances would help promote co-management, co-stewardship, and healthier land relationships.	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals. The Secretary does not have the authority to establish a hard deadline for conveyances under the Alaska Statehood Act, therefore the suggestion is outside the scope of this EIS.	N
13901-3	Anonymous		Mitigating risk of acidic effluent is possible during design of modern mine operations in the U.S. through technical review in environmental assessments or impact statements per the National Environmental Policy Act of 1969. However, state and federal regulators must require that adequate bonding be posted for cleanup and ensure permitting review by independent technical experts is done on all facets of mining operations, including transportation of ore to distant processing sites where tailings will be stores in perpetuity.	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals and will not make decisions management decisions on for particular resource; the suggestion is outside the scope of the EIS.	N
13926-1	Mark Sogge		The D1 lands in the Chilkat high country host healthy populations of mountain goats, which are an essential cultural and subsistence resource for local people. These areas should be designated Areas of Critical Habitat, and the rest of the D1 lands in this are should also be placed under permanent protection, considering the need to protect important migratory bird habitat and the abundant other wildlife species present.	The BLM does not have the authority to designate Critical Habitat and can only consider other types of land use designations through a land use planning process. Withdrawals would be retained on these lands in Alternatives A and B.	N
13933-4	Anonymous		Before withdrawing any lands from the 17(d)(1) protection, a study should be made as to how the actions would comply with the National Strategy for the Arctic Region (October, 2022), specifically with "Strategic Objective 2.2: Pursue International Initiatives to Mitigate Emissions in the Arctic" "The United States will work to reduce localized emissions of carbon dioxide, methane, and black carbon, ... to complement our global mitigation efforts. Mitigation should also include protection of habitats that store carbon, such as forests, tundra and coastal marshes." And with "Strategic Objective 2.4: Conserve and Protect Arctic Ecosystems, including through Indigenous Co-Production and Co-Mangement: "The United States must continue to pursue multilateral initiatives and research to conserve and protect Arctic biodiversity, ecosystems, habitats, and wildlife, expanding on concepts like the Northern Bering Sea Climate Resilience Area." The objectives go on to detail that "Conservation in the Arctic should be consistent with the America the Beautiful Initiative, which sets out our national goal of conserving 30 percent of America's land and waters by 2030, as well as our international commitments to conservation and climate." Keeping these lands under BLM protected status would go a long way to furthering, not defeating this initiative's 30 X 30 goal. At the very least, a detailed analysis of what the release of these lands for possible development would do to these objectives should be made and detailed in any EIS.	Along with other related policies or strategies, the goals and objectives of the National Strategy for the Arctic Region are generally considered through the range of alternatives in the EIS. Further, the CEQ regulations specify that agencies shall use the best available data and information when preparing conducting a NEPA analysis and therefore shall not postpone or delay an NEPA analysis process for the purposes of conducting additional data collection. As related to the America the Beautiful initiative to conserve at least 30 percent of America's lands and waters by 2030, see response to comment 1802-1.	N
14374-2	Natalie Dawson		I would like to request, that in addition to maintaining the BLM D1 withdrawals, that the BLM recognize the importance of subsistence, recreation and traditional uses of these lands and protect them from transfer to the state of Alaska by finalizing the recognized importance of the proposed Area of Critical Environmental Concern. The Chilkat ACEC was first described and proposed by Chilkat Indian Village (Klukwan) in 2017 as part of the Haines Amendment Ring of Fire RMP revision. BLM recognized the importance of this proposed ACEC, but failed to make a final determination on the ACEC and instead said that the SRMA designation would meet the same criteria. An SRMA is not the same as an ACEC, and I would like to recommend that BLM finalize this ACEC as part of a co-management strategy with Chilkat Indian Village (Klukwan).	The Secretary's decision is limited to revoking, revoking in part, or maintaining the withdrawals; she will not make decisions on co-stewardship or management decisions on for particular resource, thus the suggestion is outside the scope of the EIS.	N

Out of Scope					
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14378-3	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	As part of our many years of engagement on the ROF RMP and Haines Amendment, we also requested an ACEC designation as part of the most recent RMP revision and Haines Amendment process. This designation was deemed "valid" based on BLM's review of the designation, but in the final RMP, the ACEC designation was not moved forward. We would like BLM to revisit this designation as part of this scoping process and formalization of the alternatives for the DEIS	The BLM can only consider ACEC designation through a land use planning process and cannot consider ACEC designation through a different process; consideration ACEC is outside the scope of this EIS. Withdrawals would be retained on lands with ACEC nominations in Alternatives A and B.	N
14378-9	Jones Hotch	Alaska Wilderness League; Chilkat Indian Village	We have been in discussions with BLM and DOI leadership in Washington DC about creating a co-management or co-stewardship agreement for all lands and waters within our traditional territories. This agreement can focus on 1) watershed monitoring, and 2) protection of sacred sites. We would like to see an effort by BLM leadership to help us outline the specific guidelines of such an agreement. We also understand that other sovereign Tribal governments across Alaska are asking for similar actions to be taken by BLM within their traditional territories. We request BLM use this EIS process for D1 withdrawals to complete consultations with tribal governments and co-create these co-management agreements.	See response to 14378-10.	N
14598-1	Thomas Ely		I would like to see further protections for these lands, specifically the northern block in the Haines area has incredible geography, rock walls similar to Yosemite Valley. It's the headwaters of the Chilkat River, and this area should really be a designated wilderness area. It's amazing. Also, the southern block borders Glacier Bay National Park, and that should be added -- annexed to Glacier Bay National Park. So that's what I would like to see done with the BLM lands here in Haines,	The withdrawals in the Haines area would be retained under Alternatives A and B.	N
14695-1	Annie Matsov	National Park Service	We appreciate the opportunity to provide comment on the proposed management of lands adjacent to Klondike Gold Rush National Historical Park. As we discussed on April 6, 2018 with park Chief of Resources, Annie Matsov, and Natural Resources Program Manager, Jami Belt, our primary concerns are visitor experience in Skagway and along the Chilkoot Trail, and cultural and natural resource protection.	The BLM is writing a PA to comply with the Section 106 of the NHPA for the proposed project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the project area, and takes their comments into account. The parcel in the decision area that overlaps with the Chilkoot NHT is a Priority 4 effective selection that may be conveyed to the State of Alaska regardless of the Secretary's decision on this project. Additional text was added to EIS Section 3.4.1.2.4, Cultural Resources, Alternative C, to disclose this. Text was added to EIS Section 1.6.1.2, Issues Identified but Eliminated from Detailed Analysis, regarding why visitor experience is not evaluated in detail in the EIS. Recreational experiences are evaluated in EIS Section 3.5.1.2.2, Recreation Economy, and Section 3.11.1, Recreation Management and Public Access.	Y
14702-3	Catherine Heroy	State of Alaska	The most recently finalized Resource Management Plans (RMPs) for each of these planning areas recommended, upon completion of the associated National Environmental Policy Act (NEPA) reviews, to revoke all or nearly all their remaining ANCSA 17(d)(1) withdrawals. The Federal Register Notice announcing the availability of this DEIS states additional NEPA analysis is needed "to correct errors in the previous decision-making processes regarding these withdrawals; and to ensure that, in accordance with ANCSA 17(d)(1), 'the public interest in these lands is properly protected,' including factors such as subsistence hunting and fishing, habitat connectivity, protection of cultural resources, and protection of threatened and endangered species [TES]." We question the existence of the errors, and the impetus for completing an SEIS considering there has been no change in circumstances since the Records of Decision (RODs) were issued. We request that the BLM provide a valid rationale for delaying implementation of the revocations as recommended in the RODs. As noted in our October 17, 2022, scoping comments (attached), the State also points to the recent Environmental Assessment and Finding of No Significant Impact signed on April 21, 2022, for the John D Dingell Jr. Conservation, Management, and Recreation Act (Dingell Act), which found that revocations of 17(d)(1) withdrawals were appropriate for the same lands.	This EIS is necessary to address the impacts that were not considered in those proposed RMPs and final EISs, including impacts to subsistence uses from opening the land to State selection. Furthermore, past BLM recommendations did not fully consider subsistence impacts through the process laid out in Section 810 of ANILCA and did not follow proper procedures under Section 106 of the NHPA for historic properties. The commenter is correct that the BLM found it appropriate to recommend opening these lands to Native allotment selection under the Dingell Act, and subsequently most of the lands within the EIS decision area were partially revoked by the Secretary to allow for the single purpose of Native allotment selection. Opening the lands to Native allotment selection has fewer impacts than opening the lands to all public land laws. The BLM concluded that opening lands to Native allotment selection would not have significant impacts and for this reason, the BLM determined issuing a finding of no significant impact was appropriate prior to providing recommendations to the Secretary on whether to open lands to Native allotment selection. The magnitude of impacts that could occur because of opening lands in the decision area to all public land laws, including the Statehood Act, are considered significant for some resources and therefore justifies an EIS. The BLM disagrees that it could issue a finding of no significant impact for full revocation of ANCSA 17(d)(1) withdrawals in the decision area.	N
14763-2	William Hunter		We want our way of life to come first, and other than opening up land to development so so we can keep our subsistence subsistence way of life? Would you would we have that a priority other than opening up land.	The Secretary has full discretion to reclassify the lands withdrawn by the ANCSA 17(d)(1) to ensure public interest is properly protected, including withdrawing the land to protect subsistence uses.	N

Out of Scope					
Letter Comment No.	Sender Name	Organization	Public Comment	Response	Text Change (Y/N)
9983-4	Gary Harrison	Chickaloon Moose Creek Native Association, Inc.	Under international law, the UN covenant -- covenant on civil and political rights 1.2 says that no people shall be deprived of their subsistence. And the way the laws are right now, our indigenous people are being deprived of their subsistence, both state and federal. And a covenant has been signed and ratified by the United States. And opening up these lands would even further go against this UN treaty that the United States has signed and ratified.	Title VIII of ANILCA, section 803, defines subsistence uses as the "customary and traditional" uses of wild resources for various uses including food, shelter, fuel, clothing, tools, transportation, handicrafts, sharing, barter, and customary trade. This definition incorporated this concept of "customary and traditional uses" of fish and wildlife from a 1978 state of Alaska law. The EIS uses the term "subsistence" consistent with the Federal statutory definition. By contrast, "subsistence" as used in Part I, Article 1.2 of the 1967 United Nations Covenant on Civil and Political Rights, refers more generally to the resources sufficient to support the population of signatory nations to the Covenant. For example, widespread famine in a country due to war or natural disaster would be a deprivation of subsistence within the meaning of the Covenant.	No
9991-2	Angela Wade; Angela Wade	Chickaloon Village	But I -- I also think that, you know, if any land, God forbid, is disposed of it, it needs to go through a thorough cultural resource survey in conjunction with the tribes that are associated.	If the ANCSA 17(d)(1) withdrawals are revoked, there would be some unavoidable impacts to cultural resources from land conveyances or mineral entry. It is not feasible to survey all lands for cultural resources across the 28-million-acre decision area. For this reason, the BLM is writing a PA to comply with the Section 106 of the NHPA for the proposed project. A PA includes how the BLM will identify, evaluate, and mitigate adverse effects to cultural resources. Those effects include the transfer of land out of Federal ownership that could result from lifting the withdrawals. The process also includes consultation with Federally recognized Tribes, ANCs, local governments, and other organizations with knowledge of cultural resources in the project area and takes their comments into account.	N
14843-3	Senator Dan Sullivan	U.S. Congress	However, on day one of the Biden Administration, the Department backtracked and falsely claimed that the withdrawals of PLOs 7899 through 7903 contained "certain procedural and legal defects in the decision-making process for these PLOs... including an insufficient analysis under [NEPA]," and, therefore, refused to publish them in the Federal Register and deferred moving forward on these land orders. This decision was subjective, as the PLOs underwent the same analysis, but PLO 7899, for example, was published, and no lawsuits were filed against the revocation.	See response to comment 14702-3.	N

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