U.S. Department of the Interior
Bureau of Land Management
Central Yukon Field Office

July 2017

Central Yukon Resource Management Plan/ Environmental Impact Statement

Preliminary Alternatives Concepts Public Comment Summary Report

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TABLES

APPENDICES

ACRONYMS AND ABBREVIATIONS

	Full Phrase
ACEC	areas of critical environmental concern
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act
BEACONS	Boreal Ecosystems Analysis for Conservation Networks
BLM	United States Department of the Interior, Bureau of Land Management
CEQ	Council of Environmental Quality
CFR	Code of Federal Regulations
CSU	conservation system unit
CYRMP	Central Yukon Resource Management Plan
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act of 1976
NEPA	National Environmental Policy Act of 1969
NPS	United States Department of the Interior, National Park Service
NWR	National Wildlife Refuge
PLO	Public Land Order
RMP	resource management plan
RNA	research natural area
ROD	Record of Decision
ROW	right-of-way
SRMA	special recreation management area
TAPs	Trans-Alaska Pipeline System
USFWS	United States Fish and Wildlife Service

CHAPTER 1
INTRODUCTION

1.1 BACKGROUND

The United States Department of the Interior, Bureau of Land Management (BLM) Central Yukon Field Office is preparing a resource management plan (RMP) with an associated environmental impact statement (EIS) for the Central Yukon Planning Area under the National Environmental Policy Act of 1969 (NEPA). The BLM's RMPs form the basis for every action and approved use on the public lands. The BLM prepares RMPs for areas of public lands, called planning areas. Planning emphasizes a collaborative environment in which local, state, and tribal governments; the public; user groups; and industry work with the BLM to identify appropriate multiple uses of public lands. Plans are periodically revised as changing conditions and resource demands require.

Through an evaluation of the existing plans, the BLM has decided that revisions are needed to the Utility Corridor RMP (BLM 1991), Central Yukon RMP (BLM 1986), and Southwest Management Framework Plan (BLM 1981). The revised Central Yukon RMP (CYRMP) will replace both the Utility Corridor and Central Yukon RMPs in their entirety and a small part of the Southwest Management Framework Plan.

This report summarizes results of the preliminary alternatives concepts outreach phase of the NEPA planning process. This phase is one of several opportunities for the public to offer input on the RMP/EIS. **Appendix A**, Preliminary Alternatives Concepts Outreach Materials, item 1—NEPA Planning Process Handout, shows all phases of the RMP process. The alternatives outreach was conducted to offer the public the opportunity to review preliminary alternatives concepts (**Appendix A**, item 2—Preliminary Alternatives Concepts Handout) that were developed by the BLM in coordination with cooperating agencies. The public was invited to participate in 12 public alternatives meetings and to offer comments during the 60-day comment period; more information is included in **Section 1.5**, Description of

the Public Involvement Process for the Public Review of Preliminary Alternatives Concepts.

Prior to this public review of preliminary alternatives concepts, the BLM conducted public scoping from June 14, 2013, to January 17, 2014. Scoping is an early and open process to determine the scope of issues surrounding the proposed actions and to identify significant issues. Public input during scoping helps the BLM to understand the issues that the public would like the agency to address as they develop the RMP. A summary of the results from public scoping has been published in a public scoping report (BLM 2015), which can be found on the project website (see **Section 1.5.4**, Project Website).

1.2 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN

The purpose of the CYRMP is to develop decisions to guide future land management within the planning area and subsequent site-specific projects. These decisions establish goals and objectives (desired outcomes) for day-to-day and long-term resource management. To achieve these goals and objectives, the RMP identifies uses (allocations) that are allowable, restricted, or prohibited.

Management decisions include measures or criteria, such as desired outcomes (goals and objectives); administrative designations, such as areas of critical environmental concern (ACECs); proposed withdrawals; and suitability for congressional designations, such as an addition to the National Wild and Scenic River System. All decisions conform to the multiple use and sustained yield mandate of the Federal Land Policy and Management Act of 1976 (FLPMA).

The need for the CYRMP is to provide guidance and to address changes in resources, circumstances, laws, policies, and regulations in the planning area since the existing plans were developed in the 1980s and 1990s. The planning area includes identified corridors for utility and transportation projects, such as identified routes for multiple roads in the State of Alaska's Roads to Resources initiative. The existing plans were completed when gold prices were a fraction of the current price; hence, development pressures related to access and mining activity have increased considerably, as has the demand for sand and gravel.

The revised CYRMP will be more relevant to current and future issues common on BLM-managed lands and will allocate resources under the multiple use and sustained yield mandate.

1.3 DESCRIPTION OF THE PLANNING AREA AND DECISION AREA

The planning area is approximately 56 million acres, approximately 13.1 million acres of which are BLM-managed lands. Other federal lands in the planning area are as follows:

- Portions of the Gates of the Arctic National Park and Preserve

- The Koyukuk, Innoko Northern Unit, Nowitna, and Kanuti National Wildlife Refuges (NWRs)
- The US Army Tanana Flats and Donnelly training areas

The decisions in the RMP will apply only to BLM-managed lands. The BLM generally manages the subsurface acres under BLM-managed lands as well as subsurface under other federal agency-administered lands. The BLM may also administer some subsurface under privately owned lands.

The planning area overlaps portions of the Northwest Arctic Borough, the North Slope Borough, the Denali Borough, and the Fairbanks North Star Borough; however, most of the planning area does not fall within any borough boundary. The planning area boundary includes 24 remote villages, 15 of which have tribal entities, and 3 Alaska Native Claims Settlement Act (ANCSA) Regional Corporation boundaries (Doyon Limited, Arctic Slope Regional Corporation, and NANA, Inc.).

The CYRMP does not change land use management for NWR lands, National Park Service (NPS) lands, or the subsurface estate under these lands. Additionally, the planning decisions and descriptions in the RMP will not apply to private lands or lands conveyed through ANCSA or lands conveyed to the State of Alaska through the Alaska Statehood Act.

Most of the planning area is administered by the BLM's Central Yukon Field Office. Lands near Fairbanks are administered by the Eastern Interior Field Office, and lands on the North Slope are administered by the Arctic Field Office. BLM-managed lands are scattered and range from parcels of a few acres up to contiguous blocks of 1 million or more acres. To include all BLM-managed lands in the RMP, the planning area boundary is drawn on a large scale. Decisions in the CYRMP, however, will only apply to BLM-managed lands.

1.4 DESCRIPTION OF ALTERNATIVES DEVELOPMENT PROCESS

The BLM developed preliminary alternatives concepts (**Appendix A**, item 2) based on the issues presented in the Scoping Report (BLM 2015) and guided by established planning criteria (as outlined in 43 Code of Federal Regulations [CFR], Part 1610). In compliance with NEPA, FLPMA, Council of Environmental Quality (CEQ) regulations, and BLM planning regulations and guidance, the BLM has produced preliminary alternatives concepts that accomplish the following:

- Address the planning issues for key resources and resource use compiled from public input, cooperating agency feedback, and tribal government input
- Fulfill the purpose and need for the RMP, with each alternative concept using a unique approach

- Meet the multiple use and sustained yield mandates of FLPMA (43 United States Code, Section 1716)
- Represent a reasonable set of goals, objectives, and actions to guide future management of the planning area
- Are capable of implementation
- Are feasible

The preliminary alternatives concepts were developed by the RMP/EIS interdisciplinary planning team, composed of personnel from the BLM and cooperating agencies, which are the United Stated Fish and Wildlife Service (USFWS) and the State of Alaska. The preliminary alternatives concepts development process was iterative and included small collaborative resource teams consisting of the BLM staff and cooperators that identified objectives and actions to address planning goals within their fields of expertise. The various resource teams met numerous times as an entire collaborative interdisciplinary team throughout this period to refine their work.

1.5 Description of the Public Involvement Process for the Public Review of Preliminary Alternatives Concepts

1.5.1 Public Meetings

The BLM invited landowners, stakeholders, and the public to meetings to discuss the CYRMP/EIS. A total of 10 meetings were held in communities across interior Alaska, and in the cities of Fairbanks and Anchorage. **Table 1-1**, Public Alternatives Meetings, describes the date, location, and attendance at each meeting. Meeting locations were chosen to offer the opportunity for attendance in remote locations as well as in Alaska's population centers (Fairbanks and Anchorage).

Meetings typically began with introductions of agency staff and public attendees, followed by a presentation of background information. This portion of the meeting followed a PowerPoint presentation, which was either distributed in hardcopy format or presented on a projector screen. Background information included overviews of the planning area, the RMP/EIS process, and the preliminary alternatives concepts. Then the meeting typically was opened for the public to ask questions, have conversations with agency staff, and review maps. Meetings were recorded to capture some of the comments that the public made. Attendees were encouraged to submit comments formally at the meeting via a comment form (**Appendix A**, item 3—Comment Form Handout) or after the meeting via mail or email. The official comment period was 60 days (January 17 through March 17, 2017); however, comments were accepted through March 31, 2017.

Table 1-1
Public Alternatives Meetings

Date	Location	Attendees
Koyukuk	January 23, 2017	20
Galena	January 24, 2017	7
Tanana	January 25, 2017	6
Allakaket	January 26, 2017	35
Ruby	February 13, 2017	16
Lake Minchumina	February 16, 2017	6
Anchorage	February 22, 2017	23
Fairbanks	February 27, 2017	50
Venetie	February 28, 2017	17
Coldfoot	March 2, 2017	4
Anaktuvuk Pass	March 7, 2017	8
Nenana	March 9, 2017	2

1.5.2 Mailing List and Postcard

In January and February 2017, the BLM sent emails tailored to each community/meeting location. In total, the BLM sent emails to approximately 250 mailing list contacts.

Additionally, the BLM sent postcards to an additional 480 mailing list contacts. Postcards were also sent directly to each general box holder in each village that was identified to hold a meeting. The list was derived from past scoping meetings, newsletter inquiries, and general public inquiries from individuals interested in the RMP planning process.

Also, points of contacts associated with adjacent federal agency units (NPS and USFWS), state agency divisions (Alaska Department of Natural Resources, Alaska Department of Fish and Game, and Alaska Department of Transportation), tribal government, village corporations, and tribal corporations were also included.

Nongovernmental organizations that have participated in past meetings or inquired about information were also included in the list, including the individuals who requested informational and the official nongovernmental organization point of contact. The purpose of these outreach efforts was to inform the public about the preliminary alternatives concepts public meetings and the associated comment period. Emails and postcards provided information on how to submit comments and where to get more information. An example email and postcard are in **Appendix A**, item 4—Outreach Email and item 5—Outreach Postcard.

1.5.3 Newspaper Advertisements and News Releases

Newspaper advertisements were published in three newspapers in January and February prior and during public alternatives meetings; **Table 1-2**, Newspaper Advertisement Publication Dates and Location, provides details of these advertisements. The *Fairbanks News-Miner* also ran the advertisement on their flyer board (virtual bulletin board) from January 16 to January 22, 2017, the week before the first meetings. An example advertisement is included in **Appendix A**, item 6—Newspaper Advertisement.

Table 1-2
Newspaper Advertisement Publication Dates and Location

Newspaper	Location	Date Advertisement Appeared
Fairbanks Daily News-Miner	Fairbanks, Alaska	January 8, 2017 January 17, 2017 January 22, 2017 February 12, 2017 February 26, 2017
Arctic Sounder	Anchorage, Alaska	January 12, 2017 February 2, 2017 February 3, 2017
Alaska Dispatch	Anchorage, Alaska	January 8, 2017 January 29, 2017 February 12, 2017 February 19, 2017

The BLM announced the public meetings through a news release on January 12, 2017. This is included in **Appendix A**, item 7—News Release.

1.5.4 Project Website

A public website was launched and is regularly updated to provide the public with the latest information about the CYRMP/EIS process. The website—https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=35315—provides background information about the project, a public involvement timeline and calendar, and maps of the planning area. It also includes copies of public information documents, such as the preliminary alternatives concepts public meeting materials discussed in **Appendix A**. Other information that can be found on the website includes a link to the scoping report, analysis of the management situation, and various other background documents. The dates and locations of all 12 preliminary alternatives concepts public meetings were announced on the website.

CHAPTER 2
COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before March 31, 2017, 14 days following the end of the formal comment period on March 17, 2017, were analyzed and are documented in this summary report. All comments received during the RMP process will be considered in alternative formulation and project planning.

A total of 62 written submissions, resulting in 953 discrete comments, were received during the comment period. Each meeting transcript was counted as a separate submission. Some of the 953 comments were coded into multiple code types, resulting in 1,164 coded comments.

The most common format used for submissions was email (32 submissions), followed by public meeting transcripts (13 submissions; note that there is one more transcript than there are public meetings because there was a transcript and hand notes from an agency attendee for the Fairbanks meeting), mail (10 submissions), public meeting hardcopies (5 submissions), and hand-delivered submissions (2 submissions).

To ensure that public comments were properly registered and that none were overlooked, the BLM used a multiphase management and tracking system. First, written submissions were logged and numbered. Then submissions were reviewed by a comment analysis team. Comments within each submission were coded according to the subject matter the comment discussed. Comments were coded into the following categories:

- **Alternatives**—This includes categories for the preliminary alternatives concepts that the public was asked to comment on (**Appendix A**, item 2; locatable minerals, lands and realty, lands with wilderness characteristics, ACECs, recreation management areas, and off-highway vehicle and travel management). Commenters also provided comments on new ideas for

alternatives, including management for coal, leasables, mineral materials, wild and scenic rivers, high value watersheds, mineral licks, climate change, and cultural resources.

- **Support for alternatives**—These are comments that are essentially votes for or against an alternative. While not technically substantive, these comments provide rationale for why commenters preferred certain alternatives or aspects of alternatives over others.
- **Impacts**—These are comments related to impacts on resources under one or more of the preliminary alternative concepts, as well as other resources that will be analyzed in the RMP/EIS. These comments will be considered during impact analysis.
- **Baseline data**—These are comments that provide useful baseline data or information on the current condition of resources in the planning area. While these comments may not be specifically related to alternatives, they are substantive and can be reviewed when writing the affected environment section of the RMP/EIS.
- **Backcountry conservation area**—This category is for comments on backcountry conservation areas, such as management of or recommendations for backcountry conservation areas.
- **Process-related**—This category is for comments related to the NEPA planning process, such as requests for the extension of the comment period, comments on public outreach efforts, cooperating agency comments, or consultation requirements.
- **Planning issues**—This category includes comments on the general BLM planning process.
- **Consistency with state, local, and tribal plans or policies**—These are comments that discuss consistency with other plans or policies in the planning area, such as Alaska National Interest Lands Conservation Act (ANILCA) or local land use plans.
- **Data, science, information**—These comments include data sources or references that submissions discuss. These data sources will be considered when writing the RMP/EIS.
- **Out of scope**—This category includes comments on implementation-level decisions, non-BLM authorizations, or policy decisions. While not substantive for the RMP/EIS, these comments are tracked so that they may be considered by the BLM when making site-specific or project-level decisions in the future.

To assist with the analysis, the BLM entered comments into a comment tracking database. Staff then categorized comments by code type. Each comment included information on commenter affiliation, commenter location, and submittal type. Finally, these identifiers were queried and tallied to provide

information in **Section 2.2.2**, Number of Comments by Category, and **Appendix B**, Comments by Category.

2.2 SUMMARY OF PUBLIC COMMENTS

2.2.1 Commenter Information

The most common commenter affiliation was individuals (24 submissions; 39 percent), followed by organizations (10 submissions; 16 percent), Alaska native or village corporation (3 submissions; 5 percent), federal government (2 submissions; 3 percent), state government (2 submissions; 3 percent), business/commercial sectors (2 submissions; 3 percent), and tribal government (1 submission; 2 percent). Eighteen submissions (29 percent) were from an unknown affiliation; this includes all transcripts.

As shown in **Table 2-1**, Submissions by Geographic Location, most submissions (51 submissions; 82 percent) were from commenters who provided contact information in Alaska. The other submissions were from Colorado (1 submission; 2 percent), Washington DC (1 submission; 2 percent), or an unknown geographic area (9 submissions; 14 percent). Public meeting transcripts were counted as separate submissions for each location; the geographic area documented for these submissions is the meeting location.

A list of commenters in included in **Appendix C**, List of Commenters.

Table 2-1
Submissions by Geographic Location

Geographic Location	Number of Submissions
Allakaket, Alaska	1
Anaktuvuk Pass, Alaska	1
Anchorage, Alaska	17
Coldfoot, Alaska	2
Fairbanks, Alaska	14
Galena, Alaska	2
Koyukuk, Alaska	1
Lake Minchumina, Alaska	2
Nenana, Alaska	1
Ruby, Alaska	2
Tanana, Alaska	1
Wasilla, Alaska	1
Wiseman, Alaska	5
Venetie, Alaska	1
Loveland, Colorado	1
Washington, DC	1
Unknown Location/Anonymous	9
Total	**62**

2.2.2 Number of Comments by Category

Table 2-2, Comments by Category, describes the distribution of comments within the topic areas described in **Section 2.1**, Method of Comment Collection and Analysis. Most comments (47 percent) were comments on alternatives, followed by comments on impacts (19 percent) and comments on baseline data (14 percent). **Appendix B** lists all the comments that were submitted during the preliminary alternatives concepts comment period.

Table 2-2
Comments by Category

Comment Category	Number of Comments	Percent of Total Comments	Appendix B Table*
Alternatives	552	47	Table B-1
Support for alternatives	60	5	Table B-2
Impacts	222	19	Table B-3
Baseline data	160	14	Table B-4
Backcountry conservation area	11	1	Table B-5
Process-related	56	5	Table B-6
Planning issues	8	1	Table B-7
Consistency with state, local, and tribal plans or policies	34	3	Table B-8
Data, science, information	21	2	Table B-9
Out of scope	40	3	Table B-10
Total	**1,164**		

*See the corresponding table in **Appendix B** for a list of all comments in a category.

2.2.3 Summary of Comments Received at Public Meetings

Public meetings offered the BLM the opportunity to hear directly from residents. In total, the BLM visited 10 communities across interior Alaska, and the cities of Fairbanks and Anchorage, as described in **Section 1.5.1**, Public Meetings. **Table 2-3**, Public Meeting Discussion Topics and Concerns, lists the topic areas that were of most interest at each public meeting. As shown in the table, several issues/concerns were common across communities, including subsistence uses, economics, and wildlife. Notes from each public meeting will be made available on the project website (see **Section 1.5.4**).

Table 2-3
Public Meeting Discussion Topics and Concerns

Meeting Location	Discussion Topics
Koyukuk	• Food sources are being depleted; this is the main concern of the attendees • Wildlife health and pollution effects on wildlife • Encroachment of outside hunters • Economic concerns (e.g., firefighting jobs and ability to sustain trapping) • Drones (e.g., ethics of hunting with the aid of drones) • Native place name preservation • Respect of trap lines

Table 2-3
Public Meeting Discussion Topics and Concerns

Meeting Location	Discussion Topics
	• History of Koyukuk, historic caribou range • BLM's role in hunting permitting • Moose population reduction • Community's hunting range, having to stay closer to the community to get resources • Impacts of guided hunting trips • Moose hunting importance • Permafrost melting • Concerns about law enforcement, hunting violations • Important resources—moose, fish (silvers, chum, and salmon), ducks, geese, beaver, bear, mink, caribou, and berries
Galena	• Overall RMP process, purpose of the RMP, next steps in the RMP process, and FLPMA • BLM authority in the planning process • Landscape and regional management • Location of BLM-managed lands relative to Galena and interconnectivity of other federal lands • Mineral potential • Bear denning • Economics and jobs, including skilled work • Concern that interior villages are dying communities • Mining and fishing conflict; mineral development impacting streams, fish, and fish spawning • Protection of fishing streams • Trapping • Law enforcement • Hog River ACEC • Huntington family hunting grounds • Subsistence use and preserving this use on BLM-managed lands • Maintaining access, including by snow machine • Biomass use • Snow cover depth • Important resources—salmon, whitefish, pike, all fish species, drift logs, and lynx
Tanana	• RMP process, purpose of the RMP, and range of alternatives • Mission Hill burial ground is an important place to be protected • Consideration of Doyon's mineral data • ACECs • Community health • Road to Tanana • Dalton Utility Corridor plan • Climate change and the necessity to change hunting dates/times in response to climate change • Moose's important role as vital to living in Tanana

Table 2-3
Public Meeting Discussion Topics and Concerns

Meeting Location	Discussion Topics
	• Fire—remediation of the waterways and streambanks that the fire burned • Mining • Concerns about management with change in presidential administration • More advance noticing of meetings requested, including more invitees • Important resources—berries, moose, and fish
Allakaket	• Loss of local caribou populations and, therefore, loss of traditional uses of caribou (clothing making) • Ambler Road, including impacts to wildlife movement, way of life, visual landscape, pollution, and litter • Movement (leaving) of people • Mining • Impacts on streams and fish from mining • Trapping • Community health (health relies on people eating traditionally) • Passing on land to future generations • Economics and jobs • Preserving traditional ways of life (for future generations) • Loss of culture • Access to running water • Environmental justice • Dalton Utility Corridor and Public Land Order (PLO) • Important places—Big Lake, Cat's Claw, Fish Lake, Old Man River, Old River, Crater Lake, Ray Mountains, John River Forest, Hunts Fork, and South Fork • Important resources—caribou, fish, moose, geese, ducks, beaver, and berries
Ruby	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • How BLM offices operate • ACEC—what an ACEC is, how it's nominated • Discussion regarding Ruby's ACEC nomination. Ruby ACEC nomination by tribes didn't fit the BLM criteria well. ACEC must have more than local importance. ACECs are not the only tool available. • Concern was expressed regarding revelation of sensitive site locations in an ACEC nomination • Mining—better mining surveys need to be completed in the area • Mineral exploration—expressed concern about new mining operations and desire for existing operations to continue • Community health (health relies on people eating traditionally) • Passing on land to future generations • Economics and jobs • Tribal consultation and engagement • Tourism • Hunting guiding needs to be managed better, as guiding may have impacted wildlife populations • Preserving traditional ways of life (for future generations)

Table 2-3
Public Meeting Discussion Topics and Concerns

Meeting Location	Discussion Topics
	• Land exchange/disposal • Important places—Melozi Hot Springs, Little Melozi area, and the area north of the river as a fall and winter trapping area • Potential caribou reintroduction in Melozi area • Important resources—fish, moose, and caribou
Lake Minchumina	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • ACEC status—how status is established and removed • BLM coordination with state, local, and other federal agencies • ANILCA versus NEPA • What constitutes substantive comments • Trapping • Right-of-way (ROW) for state access • Mineral extraction • Special Use Permit durations • Economics, jobs • Trapping cabins/commercial use and newer trapping cabin policies • Freeze depth for overland travel does not seem correct, as it is at 12 inches while vegetation surveys in the area suggest 4 inches • Use of trails for trapping—not wanting to disclose these corridors, as they are not Freedom of Information Act exempt if included in the plan/discussion • Important resources—fish, moose, beaver, and berries
Anchorage	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Dalton Utility Corridor withdrawal—PLO 5150 • ACEC nominations and management • ANILCA versus NEPA • Substantive comments • Restrictions on locatable mining • Process for locatable mineral mining on BLM-managed lands • Guided recreation • Impacts to streams and fish from mining
Fairbanks	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Dalton Utility Corridor withdrawal—PLO 5150 • ACEC nominations and management • ANILCA versus NEPA • Substantive comments • Economics and jobs • Land exchange/disposal • Guided recreation • Responsible hunting practices • Impacts to streams and fish from mining • Access to private inholdings • Dividing the planning area into subunits

Table 2-3
Public Meeting Discussion Topics and Concerns

Meeting Location	Discussion Topics
Venetie	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Protection of watersheds • Protection of fishing and hunting habitats • Locatable development activities • Development in the Dalton Utility Corridor—associated impacts on resources • Subsistence
Coldfoot	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Dalton Utility Corridor withdrawal—PLO 5150 • ACEC nominations and management • Dalton Special Recreation Management Area (SRMA)—need for more pullouts and maintenance services • Locatable mining impacts • Guided recreation
Anaktuvuk Pass	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Dalton Utility Corridor withdrawal—PLO 5150 • Mineral entry • Caribou—dwindling populations due to overdevelopment of Dalton • Hunting/trapping • Burial grounds • ROW corridor • Government-to-government consultation • Over-snow travel • Lack of access to inholdings by tribal members in Gates of the Arctic National Park and Preserve
Nenana	• RMP process, purpose of the RMP, next steps in the RMP process, and NEPA • Dalton Utility Corridor withdrawal—PLO 5150 • ACEC nominations and management • Water quality and development around Dall River headwaters • Ambler Road—access and boundary concerns • Hot springs • Native allotment • Dwindling pike populations • Access to hunting in the fall • State management versus BLM management • ROW exclusion • Moose and caribou • Environmental justice—frustration over Dalton, Ambler, and stress on communities • Tanana Chiefs Conference—want to increase tribal involvement in the plan • Issues with hunting for subsistence and bringing resources back to Fairbanks from allotments • Locatable mining impacts • Effective outreach—the BLM should spend more time in communities • Funding for tribes to gather data for the plan

2.2.4 Summaries of Comments Related to Alternatives

The following section summarizes the substantive comments made during the comment period for the preliminary alternatives concepts. The purpose of this comment period was to gather comments that will help the BLM develop the RMP alternatives; therefore, the summaries focus on comments made within categories that are specific to the alternatives. However, the BLM did receive comments that were not related to alternatives. These comments are not summarized below but are included in **Appendix B**. The BLM interdisciplinary team will consider these comments when developing the RMP/EIS.

Alternatives—General

General comments are not specific to any alternative or resource, or they may apply to multiple alternatives. Commenters stated that some alternatives are too extreme and requested clarification on the range of alternatives.

Commenters suggested changes to the alternatives, including new elements. Examples of this are watershed protection, use of high priority watersheds, timber harvesting for biofuel, climate change impacts and resiliency, and key focal species. One commenter suggested using the Boreal Ecosystems Analysis for Conservation Networks (BEACONS) model for creating alternatives.

Alternatives—Locatable Minerals

Commenters primarily focused on mineral entry and clarification on how open/withdrawn areas are determined. Commenters requested more clear information on acres open/withdrawn to locatable mineral entry, including more maps.

Some commenters believed that the alternatives are too restrictive and failed to meet the BLM's multiple use mandate, as required by FLPMA. Commenters stated that miners should continue to have access to develop their existing claims, and they requested that the BLM analyze the potential for new mining.

Some commenters requested the withdrawn-to-mineral entry area around the Trans-Alaska Pipeline System (TAPs) be reexamined and narrowed, to encourage future development. Commenters would like to see areas of high mineral potential open for locatable mineral development.

Many commenters believed that more areas need to be withdrawn to mineral entry to protect fish and wildlife resources from the impacts of mining. Some suggested an alternative where all areas are withdrawn to mineral entry. If closure is not an option, then they requested stringent permitting.

Commenters were concerned about the impact of mining on water quality and quantity, and they requested standard operating procedures and monitoring to mitigate potential impacts. Commenters suggested specific areas that should be withdrawn from mineral entry.

Commenters also requested buffer zones around watersheds and critical and sensitive areas. Requests were also made to retain closures for areas with high scenic value. More collaboration between tribes and the BLM was requested to identify areas of withdrawal around tribal lands.

Comments related to specific alternatives are as follows:

- For Alternative A, commenters would like to clarify the existing conditions by including the acres open to locatable mineral entry, acres withdrawn from locatable mineral entry, and areas recommended for withdrawal from locatable mineral entry.
- For Alternative B, some commenters would like to see greater protection on watersheds and lands impacted by mineral development. They would like to see the greatest protection for conservation system units (CSUs), watersheds, drainage basins, Redlands Lake, and the Jim River and Galena Mountain Caribou ACECs.
- For Alternative C, commenters would like to see lands with high-value fisheries that feed into CSUs withdrawn from mineral entry.
- For Alternative D, one commenter requested more restrictions on locatable mineral development, rather than an all or nothing approach.

Alternatives—Lands and Realty

Commenters stated support for maintaining PLO 5150, and others stated concerns that the alternatives violate FLPMA and ANILCA by lifting PLO 5150. Commenters suggested changes to specific alternatives about lands and realty, including edits to maps, boundaries, and acreages, clarification of information, maintenance of withdrawals, new withdrawals, and ROW changes. Some commenters would like to see PLO 5150 kept in place to retain connectivity between CSUs and fragile habitats, while others would like to see it lifted entirely or in specific areas.

Comments related to specific alternatives are as follows:

- For Alternative A, commenters would like to see proposed (not finalized) withdrawals included in the previous RMP. Commenters would like to see total acres of land already developed in the Dalton Utility Corridor or permitted ROWs and other development in the Dalton Utility Corridor.
- Some commenters believed Alternative B is not viable, because of the extensive ROW exclusion areas that do not provide reasonable access from BLM-managed lands.

- For Alternative C, commenters were concerned about lifting PLO 5150 in high value watersheds and floodplains. They also had concerns about lifting PLO 5150 next to the Kanuti NWR.
- For Alternative D, commenters were concerned that lifting the entire PLO 5150 would not meet the requirements of ANILCA Section 811(a). Some commenters would like to see a minimal amount of PLO 5150 retained to act as buffers along CSU boundaries.

New alternatives and alternatives elements suggested by commenters about lands and realty actions are as follows:

- An alternative where none of PLO 5150 is lifted
- An alternative where all of PLO 5150 is lifted, because it has outlived its purpose
- An alternative that would lift all PLOs or revoke outdated ANCSA land withdrawals
- A road to South Fork Koyukuk and Bettles River
- A line down the middle of the Dalton Utility Corridor to separate development
- An alternative that does not include withdrawals but meets the purposes in another way
- Concentration of development into certain areas called "development nodes"
- Special management of lands next to CSUs managed by other agencies, such as buffers, to maintain efficient management, public use, and resource protection
- Retaining ownership of lands, including land along the Dalton Utility Corridor, that support high-value watersheds and wildlife migration corridors
- Not allowing lands open to locatable mineral entry to be recommended for withdrawal
- Prioritizing lands considered for disposal, based on BEACONS benchmarks

Alternatives—Lands with Wilderness Characteristics

Commenters suggested changes or additions to alternatives about what units of lands with wilderness characteristics should be considered under the different alternatives. One commenter suggested all lands in the planning area should be protected for wilderness characteristics, because they all have wilderness characteristics. Other commenters identified areas around specific features or CSUs that should be protected for wilderness characteristics. Some

commenters were opposed to designating any lands with wilderness characteristics.

Commenters requested changes to the criteria used to determine lands that are suitable for protecting wilderness characteristics, including how mineral potential is considered when evaluating lands suitable for protection. They also suggested a clearer explanation of the benefits of protecting lands with wilderness characteristics. Other commenters would like an explanation of how lands with wilderness characteristics designation would affect those lands, including subsistence uses.

Alternatives—Areas of Critical Environmental Concern

Most comments were related to the nomination of ACECs, the determination of what ACECs should be brought forward for analysis, and the adequate size of ACECs. Commenters requested that additional and more recent data be collected and consulted when determining ACEC boundaries, particularly for caribou herds, Dall sheep, and watersheds that support CSUs. Some commenters requested ACEC boundary expansions, while others requested that boundaries be reduced.

Commenters requested the BLM to justify why ACECs were or were not considered and to provide more information on management considerations for ACECs. Commenters would like management to be transparent and to be supported by science and by other laws and regulations.

Commenters suggested specific management within certain ACECs, including opening or closing them to certain uses or activities. Other commenters questioned the purpose of keeping some of the current ACECs, specifically if they do not require special management.

Commenters suggested that the BLM should use ACECs to encourage landscape-scale management and ecosystem/watershed connectivity across federal agencies and to support the best habitats for wildlife, particularly sheep and caribou.

Comments related to specific alternatives are as follows:

- For Alternative A, commenters requested that the BLM update the status of the original ACECs/research natural area (RNAs).
- For Alternative B, commenters would like to see part of the Kanuti River drainage included as an ACEC/RNA. Some commenters believe all ACECs should be withdrawn from mineral entry. Some would also like clarification as to whether this alternative includes ACEC traditional use areas.

Alternatives—Recreation Management Areas

Many commenters requested the protection of viewsheds when considering recreation management areas. Some commenters suggested a more general approach, to facilitate recreation and public use, rather than designating recreation management areas.

Commenters asked that the lands be managed for wilderness-like recreation, emphasizing the nonmotorized recreation and protecting and enhancing the existing fish, wildlife, and water resources in these areas. Commenters were concerned about the need to manage the Dalton Utility Corridor as one special SRMA or multiple SRMAs.

Commenters also suggested many site-specific changes to the alternatives, such as using interpretive messaging, identifying key waypoints, and improving recreation facilities, for example camping and parking areas.

Commenters requested specific high-value recreational areas be considered in the RMP's recreation management actions, such as the winter travel route between the villages of Huslia and Shungnak via the Selawik Hot Springs; the Hoatza, Dulbi, and Melozitna watersheds; and the Nowitna River. Valuable scenic areas for which commenters requested protection are Finger Mountain, Kanuti River Crossing, Fish Creek Crossing, Bonanza Creek Crossing, Gobbler's Knob, Jim River Crossing, Grayling Lake, and the South Fork Koyukuk River Crossing.

Alternatives—Off-highway Vehicle and Travel Management

Commenters expressed concerns about opening or closing specific areas to travel, allowing winter access along the Dalton Utility Corridor, and how disposals would affect access to areas.

Commenters also requested that the BLM inventory all ROWs in the Dalton Utility Corridor and determine which ones should be open for public use.

Commenters requested opening specific roads and trails, including Bettles winter road, the trail between Slate Creek and Chandelar Lake Mining District, the road to Hammond River and Nolan, access up Gold Creek and Bettles River, and certain Revised Statute 2477 routes[1]. Commenters requested the

[1]Revised Statute 2477 derives from Section 8 of the Mining Law of 1866. This law was later redesignated as Section 2477 of Revised Statutes of 1878, a/k/a RS 2477. The statute simply provided: "[t]he right of way for the construction of highways over public lands, not reserved for public uses, is hereby granted." Historically, the term "highway" included foot trails, pack trails, sled dog trails, crudely constructed wagon roads and other corridors of transportation. Alaska Statute 19.45.001(9) defines highways as including roads, streets, trails, walks, bridges, tunnels, drainage structures and other similar or related structures or facilities. In Alaska, these rights-of-way were perfected by simple use or acts of acceptance by public authorities. FLPMA repealed Revised Statute 2477 in 1976; however, valid existing rights were protected. Revised Statute 2477s were established in Alaska through use or development until virtually all federal land in Alaska was withdrawn in 1969. Revised Statute 2477 includes historic routes which exist not only on federal lands (including present day BLM, NPS, and National Forest System lands), but also on former federal lands which are now held by the state or owned by private parties.

alternatives address holders' rights to access, in accordance with Title XI and Section 1323(b) of ANILCA.

Commenters suggested changes or additions to alternatives as follows:

- Keeping access open
- Not allowing off-highway vehicle use, unless it is for subsistence use
- Protecting ground cover and viewsheds
- Restricting aircraft landings in specific areas
- Using permafrost maps for decision-making

New Alternatives Ideas

The following section summarizes comments on alternatives related to resource topic areas that were not presented in the preliminary alternatives concepts. The BLM interdisciplinary team will consider these comments when developing the draft alternatives as part of the RMP/EIS.

- **Coal**—One commenter stated that unleased coal lands should be reviewed for further potential leasing and development.
- **Leasables**—Commenters questioned what minerals are available for leasing and suggested that currently closed areas should be reviewed for potential leasing.
- **Mineral materials**—One commenter stated that more mineral materials will need to be extracted to meet the demands of future development in the area.
- **Wild and scenic rivers**—Commenters suggested that a wild and scenic river study be conducted, while others stated opposition to such a study and to any additional wild and scenic river designations.
- **High value watersheds**—Commenters requested clarification on what is considered a high value watershed and suggested areas that should be considered as such.
- **Mineral licks**—One commenter suggested that the BLM explain management concerns about mineral licks.
- **Climate change**—Commenters suggested that the RMP include climate change considerations and provide for climate change resiliency and adaptation.
- **Cultural resources**—Commenters stated support for an alternative that protects cultural and paleo-ancestral sites, including use of backcountry conservation areas.

CHAPTER 3
FUTURE STEPS

3.1 FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The NEPA Planning Process for the CYRMP/EIS is summarized in **Appendix A**, item 1. The next phase of the BLM's EIS process is to further develop the alternatives based on the comments submitted during the preliminary alternatives concepts outreach and conduct an impact analysis of the draft alternatives. This impact analysis will address issues identified during scoping and preliminary alternatives concepts comment periods. In compliance with NEPA, CEQ regulations, and BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation.

The analysis of the alternatives will be documented in a Draft EIS. The BLM may also identify a preferred alternative in a Draft EIS. The preferred alternative, if identified, may be comprised of a combination of components from various other alternatives to best address the issues. The draft document, anticipated to be published in 2018, will be widely distributed to elected officials, regulatory agencies, and members of the public, and it will be available on the project website (see **Section 1.5.4**). The availability of the draft document will be announced via a notice of availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held in the planning area during the 90-day comment period.

After the public comment period, the BLM will review and analyze public comments and determine what changes need to be made to the document. The BLM will then revise the Draft EIS and prepare a Final EIS. The Final EIS will then be published, and the availability of the document will be announced in the *Federal Register*. The date the notice appears in the *Federal Register* initiates the required minimum 30-day availability protest period. Although this is not a formal public comment period, the BLM may receive comments. If there are comments on the Final EIS, the BLM will determine if they have merit (for example, if the comments identify significant new circumstances or information

relevant to environmental concerns and bear upon the proposed action, or if the comments note a correction to be addressed). Any comments received may be addressed in the Record of Decision (ROD).

The BLM will prepare the ROD to document the selected alternative and any accompanying mitigation measures. No action concerning the proposal may be taken until the ROD has been issued, except under conditions specified in CEQ regulations 40 CFR, Subpart 1506.1.

All publications, including this report, newsletters, the Draft EIS, Final EIS, ROD, and the notices of availability of the Draft EIS, Final EIS, and the ROD, will be published on the project website (see **Section 1.5.4**). In addition, pertinent dates regarding solicitation of public comments will be published on the website.

3.2 CONTACT INFORMATION

The public is invited and encouraged to participate throughout the environmental analysis process for the CYRMP/EIS.

3.2.1 Contacts

Anyone wishing to be added to or removed from the distribution list, wishing to change their contact information, or requesting further information may send a request to CentralYukon@blm.gov or mail a request to:

Chel Ethun
Bureau of Land Management
Fairbanks District Office
222 University Avenue
Fairbanks, AK 99709-3844

Please provide your name, mailing address, and email address, as well as the preferred method to receive information. Before submitting written comments regarding a NEPA action, be advised that your entire comment—including personally identifiable information (such as your address, phone number, and email address)—may be made publicly available at any time. While you can request that your personally identifiable information be withheld from public review, we cannot guarantee that we will be able to do so.

CHAPTER 4
REFERENCES

BLM (US Department of the Interior, Bureau of Land Management). 1981. Southwest Planning Area Management Framework Plan. Prepared by the Anchorage District Environmental Staff for the McGrath Resource Area. Anchorage, Alaska. October 1981.

_____. 1986. Central Yukon Planning Area Resource Management Plan Record of Decision. Fairbanks District Office, Northwest Resource Area. Fairbanks, Alaska. September 1986.

_____. 1991. Utility Corridor Resource Management Plan/Final Environmental Impact Statement Record of Decision. Arctic District Office, Fairbanks, Alaska. January 1991.

_____. 2015. Scoping Report for the Central Yukon Resource Management Plan. Central Yukon Field Office, Fairbanks, Alaska. March 2015. Internet website: https://eplanning.blm.gov/epl-front-office/projects/lup/35315/56047/60740/CYRMP_Scoping_Report_Web_Final.pdf.

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Appendix A

Preliminary Alternatives Concepts
Outreach Materials

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APPENDIX A
PRELIMINARY ALTERNATIVES CONCEPTS OUTREACH MATERIALS

The preliminary alternatives concepts outreach included an informational email and postcard, a newspaper advertisement, a news release, and public meeting handouts. The official comment period was 60 days (January 17 through March 17, 2017); however, comments were accepted through March 31, 2017.

Information provided to the public during the preliminary alternatives concepts comment period is included in this appendix. This includes the following:

- NEPA Planning Process handout (1 page)
- Preliminary Alternatives Concepts handout (36 pages)
- Comment Form handout (2 pages)
- Outreach email (1 page)
- Outreach postcard (2 pages)
- Newspaper advertisement (1 page)
- News release (1 pages)
- Providing Substantive Comments handout (1 page)
- Preliminary Alternatives Glossary (5 pages)

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Central Yukon
Resource Management Plan

Bureau of Land Management
US Department of Interior

BLM

Environmental Impact Statement

NEPA PLANNING PROCESS

BLM Issues Notice of Intent to prepare the Resource Management Plan (RMP)/Environmental Impact Statement (EIS) — *Issued June 14, 2013*

↓

Conduct Public Scoping
- BLM provides a minimum 60-day public comment period on issues and planning criteria
- BLM documents results of scoping in a report

June 2013 - January 2014

↓

BLM Publishes Areas of Critical Environmental Concern (ACEC) Report — *November 2015*

↓

BLM Publishes the Analysis of the Management Situation — *April 2016*

↓

BLM and Cooperating Agencies Formulate Alternatives — Fall 2014 - Winter 2015 and Fall 2016 - Summer 2017

↓

We Are Here →

BLM Conducts Preliminary Alternatives Concepts Outreach
- BLM provides a minimum 60-day comment period on preliminary alternatives concepts
- BLM documents results of alternatives outreach in a summary report

Winter - Spring 2017

↓

BLM Analyzes Effects of Alternatives — Fall 2017 - Winter 2018

↓

BLM Prepares a Draft RMP/Draft EIS — Spring - Summer 2018

↓

BLM Publishes Notice of Availability and Provides a 100-day Public Comment Period — Fall 2018

↓

BLM Prepares Proposed RMP and Final EIS — Winter - Summer 2019

↓

BLM publishes Notice of Availability and provides a 30-day protest period; resolve protests

BLM provides a 60-day Governor's Consistency Review Period

Summer 2019

↓

BLM Prepares Record of Decision/Approved RMP — Fall 2019 - Spring 2020

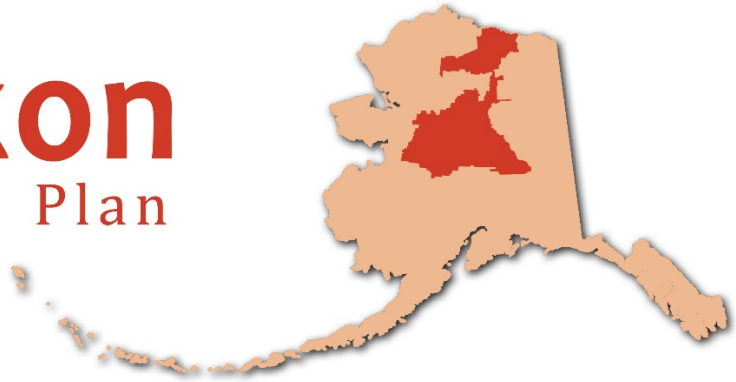
↓

BLM implements, monitors, and evaluates plan decisions

**Orange boxes indicate completed steps.*

BLM Land Use Planning Handbook (H-1601-1)

Central Yukon
Resource Management Plan



Preliminary Alternatives Concepts

Preliminary Alternatives Outreach Period
January 17–March 17, 2017

TABLE OF CONTENTS

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ACRONYMS AND ABBREVIATIONS

	Full Phrase
ACEC	areas of critical environmental concern
ANILCA	Alaska National Interest Lands Conservation Act
BLM	US Department of the Interior, Bureau of Land Management
CFR	Code of Federal Regulations
CSU	Conservation System Unit
EIS	environmental impact statement
ERMA	extensive recreation management area
GVW	gross vehicle weight
OHV	off-highway vehicle
PLO	public land order
RNA	research natural area
ROW	right-of-way
SRMA	special recreation management area

1. INTRODUCTION

The Bureau of Land Management (BLM) Central Yukon Field Office is providing this Preliminary Alternatives Concepts document to share what we have developed since public scoping was completed in 2014. The purpose is to share a preliminary range of alternatives concepts (Alternatives A–D) for key resources and resource uses. The document also seeks the public's input on how these concepts would affect them and what is missing from the range of alternatives. **Specifically, how do the proposed management decisions affect subsistence resources, access, and development opportunity, while still managing the landscape to be resilient to change?**

Please remember that what we have prepared is preliminary; the BLM will use feedback from this outreach effort to continue to refine the draft alternatives for inclusion in the Draft Resource Management Plan (RMP)/Environmental Impact Statement (EIS). We welcome your feedback in the form of e-mails, written comment forms, and oral feedback at public meetings during this outreach period (see **Section 4**, How to Comment).

2. HOW TO READ THE TABLES

During the development of the preliminary range of alternatives concepts, the Central Yukon RMP/EIS planning team, including state and federal cooperators, developed goals and objectives for each resource.

Goals are broad statements of desired outcomes that usually are not quantifiable. Goals typically apply to the entire planning area and pertain to all alternatives.

Objectives identify specific desired outcomes for resources. Objectives are usually quantifiable and measurable and may have established time frames for achievement.

RMP/EIS decisions consist of identifying and clearly defining goals and objectives for resources and resource uses and the allowable uses and management actions necessary for achieving the goals and objectives. The decisions being made in this RMP/EIS apply to BLM-managed lands only.

The basic goal of alternatives development is to produce distinct potential management scenarios that satisfy the following:

- Address the identified major planning issues
- Explore opportunities to enhance management of resources and resource uses

- Resolve conflicts among resources and resource uses
- Meet the purpose of and need for the RMP/EIS
- Are feasible

The BLM has identified the following preliminary alternatives concepts and related management actions for locatable minerals, lands and realty, lands with wilderness characteristics, areas of critical environmental concern (ACECs), recreation, and off-highway vehicle (OHV) allocations. These actions are preliminary and may change in response to your comments and questions. Rounded acre calculations are based on these initial concepts and are subject to change as the BLM further refines the alternatives. In addition, these actions represent only some of the management actions that will be included in the full Draft RMP/EIS. The public will have an opportunity to review and comment on the full suite of actions that comprise the alternatives with the Draft RMP/EIS.

The following themes guided development of each alternative and its corresponding management actions listed in the tables below:

- **Alternative A**—This alternative is the No Action alternative and consists of continuation of current management. As such, consideration of landscape connectivity, adaptability to climate change, and key focal species are not specifically considered in this alternative. Under Alternative A, there are 18 existing ACECs and 8 research natural areas (RNAs), totaling approximately 1.8 million acres, designated to protect relevant and important values and research opportunities. Approximately 8 million acres are open to locatable mineral entry.
- **Alternative B**—This alternative emphasizes protection of resource values. Planning for landscape connectivity, adaptability to climate change, and key focal species would be considered to a greater degree in this alternative, with less emphasis on resource uses. Thirty-three ACECs and RNAs (approximately 4 million acres) would be designated under this alternative, with proposed management to address a wide range of relevant and important values and research opportunities. Approximately 500,000 acres would be open to locatable mineral entry. Under this alternative, a recommendation would be made to modify Public Land Order (PLO) 5150, making approximately 45,400 acres available for State selection and subsequent conveyance in fulfillment of its remaining land entitlement. All remaining public lands would continue to be managed by the BLM.
- **Alternative C**—This alternative emphasizes a blend of resource protection and resource uses. Landscape connectivity, adaptability to climate change, and key focal species would be considered in the context of allowing for more mineral development and other resource uses. As with Alternative B, 33 ACECs and RNAs (approximately 4 million acres) would be designated under this alternative; although management to protect relevant and important values would be less restrictive for resource uses than under Alternative B. Areas of moderate to high mineral potential (approximately 6.7 million acres) would be open to locatable mineral entry. Under this alternative, a recommendation would be made to modify PLO 5150 making approximately 152,400 acres

available for State selection and subsequent conveyance in fulfillment of its remaining land entitlement. All remaining public lands would continue to be managed by the BLM.

- **Alternative D**—This alternative emphasizes management to facilitate resource development more than the other alternatives. Landscape connectivity, adaptability to climate change, and key focal species would be addressed in the context of considering connectivity between existing Conservation System Units (CSUs; e.g., national wildlife refuges and national parks) in the planning area. Two ACECs (approximately 85,000 acres) would be designated under this alternative. Most of the BLM-managed lands in the planning area (13 million acres) would be open to locatable mineral entry. Under this alternative, a recommendation would be made to modify PLO 5150 making approximately 2.1 million acres available for State selection and subsequent conveyance in fulfillment of its remaining land entitlement. All remaining public lands would continue to be managed by the BLM.

In the tables below, the Alternative A (No Action) column portrays the current management scenario for the listed resources and resource uses in the planning area.

The purpose of the Alternative B, C, and D columns is to demonstrate a range of decision options that the public can provide input on.

3. PRELIMINARY ALTERNATIVES CONCEPTS TABLES

3.1 Locatable Minerals

Goal

- To provide land use opportunities contributing to economic benefits, while protecting or minimizing adverse impacts on other resources.

Objectives

- Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU.
- Require and provide guidance regarding plans and notices that have sufficient quality and detail to process in a timely manner.
- Process all plans and notices in accordance with 43 Code of Federal Regulations (CFR), Parts 3809 and 3715, with a focus on quality product delivery to applicants within a reasonable time frame, to support Alaska's unique and seasonally dependent mining industry.

- Ensure adequate and timely reclamation of mine sites, both placer and hard rock, to comply with the latest industry standards, best management practices, and BLM policy.

Overview

Management of locatable mineral entry and development on BLM-managed lands would continue as under Alternative A. Current withdrawals, recommendations for withdrawal, or other limitations on locatable mineral development would largely be removed under Alternative D. Across alternatives, some designated ACECs and hot springs are recommended for withdrawal. Alternative B has the same number of ACECs as Alternative C. Under Alternative D, withdrawal would be recommended for the Toolik Lake RNA only. Mineral licks are recommended for withdrawal under Alternatives A, B, and C, while lands managed for wilderness characteristics are recommended for withdrawal under Alternatives B and C only.

The BLM would like your feedback on where withdrawals should be retained and where they should be lifted.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Currently Withdrawn from Locatable Mineral Entry				
1.	8,062,000 acres are **open** for locatable mineral entry. 5,060,000 acres are **withdrawn** or **recommended for withdrawal** from locatable mineral entry.	496,500 acres are **open** for locatable mineral entry. 12,752,000 acres are **withdrawn** or **recommended for withdrawal** from locatable mineral entry.	6,671,000 acres are **open** for locatable mineral entry. 6,577,000 acres are **withdrawn** or **recommended for withdrawal** from locatable mineral entry.	13,170,000 acres are **open** for locatable mineral entry. 78,000 acres are **recommended for withdrawal** from locatable mineral entry.
2.	Areas currently **withdrawn** from locatable mineral entry: • Hot springs (PLO 399, as amended by PLO 614) • Inner Corridor (PLO 5150) • PLO 5169 • PLO 5173 • PLO 5179 • PLO 5184 • PLO 5354 • PLO 5180 (withdrawn except for metalliferous minerals) • PLO 5186 (withdrawn except for metalliferous minerals)	Same as Alternative A.	Same as Alternative A, except that the BLM would recommend lifting portions of the PLO 5150 withdrawal, so fewer acers would be withdrawn.	Portions of PLO 5150 would be lifted and remaining portions would continue to be withdrawn.
Recommend for Withdrawal from Locatable Mineral Entry				
3.	Recommended for **withdrawal** from locatable mineral entry, per the current applicable RMP[1]:	Recommended for **withdrawal** from locatable mineral entry: • High value watersheds[2]	Recommended for **withdrawal** from locatable mineral entry: • Mineral licks 0.31-mile (0.5-	Recommended for **withdrawal** from locatable mineral entry: • Hot springs not already

[1]Recommendations in this list were never implemented.
[2]High value watersheds are those watersheds identified as high value fisheries.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
	• Mineral licks (160-acre parcel) • Nulato River watershed • Kaltag River watershed • Bear Creek Drainage Basin • Kala Creek and Branch Creek drainage basin • All sections within 2 miles of identified peregrine falcon nesting sites • The streambed and 300 feet of either side of the streambed of Clear Creek, Caribou Creek, Bear Creek, a portion of Indian River, and a portion of Tozitna River • Five townships outside the southeast corner of Kanuti Wildlife Refuge • ACECs o Arms Lake o Hogatza River o Indian River o Ishtalitna Creek Hot Springs o Lake Todatonten Pingos o McQuesten Creek o Redlands Lake o South Todatonten Summit o Spooky Valley o Tozitna River, for crucial spawning habitat	• Suitable river segments classified as Wild per the Wild and Scenic Rivers Act • Mineral licks 0.31-mile (0.5-kilometer) radius • Hot springs • ACECs o Arms Lake o Accomplishment Creek o Alatna River o Galbraith Lake o Hogatza River o Indian River o Ishtalitna Creek Hot Springs o Jim River o Klikhtentotzna Creek o Lake Todatonten Pingos o McQuesten Creek o Mentanontli River/Lake Todatonten o Midnight Dome/Kalhabuk o Ray Mountains o Sethkokna River o Spooky Valley o South Todatonten Summit o South Fork Koyukuk o Sukakpak Mountain o Upper Teedriinjik (Chandalar) River o Toolik Lake o Wheeler Creek	kilometer) radius • Hot springs not already withdrawn • ACECs o Arms Lake o Galbraith Lake o Lake Todatonten Pingos o Redlands Lake o South Todatonten Summit o Sukakpak Mountain o Toolik Lake Also **recommended for withdrawal** in moderate-to-high mineral potential areas only: • Galena Mountain Caribou ACEC	withdrawn • Toolik Lake ACEC/RNA

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		Also **recommend for withdrawal** in moderate-to-high mineral potential areas only: • ACECs o Galena Mountain Caribou o Sulukna Riva o Upper Kanuti River		

3.2 Lands and Realty

Goals

- Meet public needs for use authorizations such as rights-of-ways (ROWs), alternative energy sources, and permits while minimizing adverse impacts to resource values.
- Minimize the proliferation of egress routes out of the Utility Corridor (e.g., access to mining claims, private parcels, and Roads to Resources).
- Retain public lands with high resource values. Adjust land to consolidate public land holdings, acquire lands with high public resource values, and meet public and community needs.
- Remove overlapping or unneeded withdrawals.

Objectives

- The Utility Corridor continues to support existing and future anticipated transportation and utility projects, while still maintaining visual, recreational, and ecological values, including connectivity between conservation units adjacent to the corridor.
- Continue management of 17(b) easements that have been reserved in patents or interim conveyances to Alaska Native Claims Settlement Act corporations for continued access to public lands in accordance with Instruction Memorandum No. AK 2007-037, 17(b) Easement Management Handbook[3].

[3]BLM Instruction Memorandum No. AK 2007-037. Alaska Native Claims Settlement Act 17(b) Easement Management Handbook. July 3, 2007.

- Identify ROW corridors that promote appropriate infrastructure development.
- Establish development nodes to minimize sprawl and to concentrate development along roadways; particularly, intersections with the Utility Corridor.
- Identify ROW exclusion and avoidance areas needed to protect resources.
- Once conveyances are complete, land ownership patterns in the planning area allow for efficient and effective management of the public lands, minimizing the number of small, isolated BLM parcels that are difficult to manage.
- Public land record is cleaned up and simplified by revocation of outdated or overlapping withdrawals.
- Consolidate land management that sustains natural resources necessary for meeting subsistence needs.

Overview

The BLM issues ROWs for such things as roads, utility lines, communication sites, and pipelines. In areas identified as ROW exclusion areas, the BLM would not issue any ROWs for any reason. Under Alternative A, there are no ROW exclusion areas and only hot springs would be ROW exclusion areas under Alternative D. Alternative B would have the most areas identified as ROW exclusion areas, followed by Alternative C.

In addition to the Dalton Utility Corridor, which currently serves as the main utility corridor in the planning area, the BLM would identify a range of alternatives that would identify additional corridors to fulfill transportation and other utility needs. The BLM would prioritize the placement of utilities and transportation routes in these corridors. Under Alternatives B, C, and D, the BLM would identify the Ambler Road corridor made up of a 2.5-mile buffer on either side of the identified route. The BLM would also identify the Umiat Road corridor, made up of the block of State-selected lands to the west of the Toolik Lake RNA.

Under Alternatives A and B, the current land order withdrawals, including that for the Dalton Utility Corridor, would remain largely in effect. Under Alternative D, the BLM would recommend lifting most land order withdrawals. Under Alternative B, the BLM would retain a moderate portion of the Dalton Utility Corridor withdrawal. Under Alternative C, the BLM would retain a small portion of the Dalton Utility Corridor withdrawal and may recommend lifting other land order withdrawals.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Right-of-Way Exclusion Areas				
1.	No similar action; there are no ROW exclusion areas.	• Suitable river segments classified as Wild per the Wild and Scenic Rivers Act • Within 0.25 miles of hot springs or lentic areas • Bluffs • Priority habitat o Caribou o Within 0.5-mile radius of mineral licks • High value watersheds[4] • ACECs o Accomplishment Creek o Alatna River o Arms Lake o Galena Mountain Caribou o Ishtalitna Creek Hot Springs o Indian River o Kanuti Hot Springs o Klikhetentotzan Creek o Lake Todatonten Pingos o McQuesten Creek o Mentanontli River/Lake Todatonten o Redlands Lake o Spooky Valley o South Todatonten Summit	• Within 0.25 miles of hot springs or lentic areas • Within 0.5-mile radius of mineral licks • ACECS o Accomplishment Creek o Alatna River o Galena Mountain Caribou ACEC o Indian River o Kanuti Hot Springs o Klikhetentotzan Creek o Mentanontli River/Lake Todatonten o Sethkokna River o South Fork Koyukuk River o Portion of Sulukna River (within the 100-year floodplain) o Portion of Tozitna River (within the 100-year floodplain) o Upper Teedriinjik (Chandalar) River o Wheeler Creek	• Hot springs

[4]High value watersheds are those watersheds identified as high value fisheries.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		o Sethkokna River o South Fork Koyukuk River o Sulukna River o Tozitna River o Upper Teedriinjik (Chandalar) River o Wheeler Creek		
Dalton Utility Corridor (PLO 5150)				
2.	Total acres: 2,149,000 Inner Corridor: 751,000	Acres proposed for modification (lifting of withdrawal): 45,400 acres.	Acres proposed for modification (lifting of withdrawal): 152,400 acres.	Acres proposed for modification (lifting of withdrawal): 2,540,000 acres.
3.	PLO 5150 designates the Inner and Outer Utility Corridors and closes these lands to State selection.	Recommend modification (lifting) of PLO 5150 where the State of Alaska has top-filed for lands, except for those that overlay ACECs designated in Alternative B, BLM administrative sites, a subsistence access zone from Prospect Creek north to Gold Creek, and areas identified for landscape connectivity.	Recommend modification (lifting) of PLO 5150 where the State of Alaska has top-filed for lands, except for those that overlay BLM administrative sites and subsistence access zones of a 1-mile corridor in the following locations: • Nutirwik Creek • Snowden Creek • Bettles River • Gold Creek • Hammond River • Wiseman Creek • Emma Creek • Slate Creek	Recommend modification (lifting) of PLO 5150 for all lands top-filed by the State.

3.3 Lands with Wilderness Characteristics

Goal

- Manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation.

Objective

Manage specific areas for their wilderness characteristics to maintain the following:

- A high degree of naturalness (where lands and resources are affected primarily by the forces of nature and where the imprint of human activity is substantially unnoticeable).
- Outstanding opportunities for solitude (when the sights, sounds, and evidence of other people are rare or infrequent and where visitors can be isolated, alone, or secluded from others) and outstanding opportunities for primitive and unconfined recreation (where the use of the area would be through nonmotorized, nonmechanical means and where minimal developed recreation facilities are encountered).

Overview

Under Alternatives A and D, no lands would be managed to protect their wilderness characteristics. Alternatives B and C are the only alternatives that would manage lands with wilderness characteristics to protect the characteristics for size, naturalness, and outstanding opportunities for solitude or primitive and unconfined recreation. Alternative B would manage more lands to protect their wilderness characteristics than Alternative C. Under both alternatives, ANILCA-specified uses would be compatible with lands with wilderness characteristics; examples are the use of cabins, shelters, airplanes, motorboats, snowmobiles, and temporary structures and equipment for subsistence hunting, fishing, and trapping. Both alternatives would exclude management of lands with wilderness characteristics from the Dalton Utility Corridor. This is because it is inconsistent with the planning criteria that recognize the purpose of the corridor and restrict the BLM from making decisions within the corridor that would be inconsistent with its purpose for providing utilities.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
1.	No lands would be managed for wilderness characteristics as a priority.	Manage 11 million acres of lands with wilderness characteristics to protect those characteristics.	Manage 5 million acres of lands with wilderness characteristics to protect those characteristics. In addition to excluding the Dalton Utility Corridor, the following criteria were considered for managing lands with wilderness characteristics: • Lands next to CSUs **or** • Wildlife migration corridors **or** • Watersheds that drain into CSUs **and** o Low mineral potential with low/medium/high certainty o Medium mineral potential with low/medium certainty o High mineral potential with low certainty	No lands managed for wilderness characteristics. Newly acquired lands would be inventoried for wilderness characteristics to maintain a current inventory only.

3.4 Areas of Critical Environmental Concern (ACECs)

Goal

- Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards.

Objective

- Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities.

Overview

ACECs are areas on public lands where special management attention is required[5] to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

Under Alternative A, only existing ACECs or RNAs would be managed to protect their relevant and important values. Only Alternatives B and C would designate additional ACECs and manage them to protect their relevant and important values. Under Alternative B, the RNAs would be managed as ACECs also.

Under all action alternatives, caribou, moose, Dall sheep, and beaver habitat are identified as priority species habitat. Priority watersheds have also been identified for important fisheries. Under all alternatives, ANILCA-specified uses, would be compatible with ACECs; examples are the use of cabins, shelters, airplanes, motorboats, snowmobiles, and temporary structures and equipment for subsistence hunting, fishing, and trapping. Under Alternative D, only the Toolik Lake RNA and Spooky Valley ACEC would be designated.

[5]When such areas are developed or used or where no development is required.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
1.	Total acres managed as ACECs: 1,796,000.	Total acres Managed as ACECs: 4,048,000.	Total acres managed as ACECs: 4,048,000.	Total acres managed as ACECs: 85,800.
2.	Manage the following areas to protect their relevant and important values (values identified): • Arms Lake RNA—soil, vegetation • Dulbi River ACEC—wildlife • Galbraith Lake ACEC—wildlife, cultural, scenic • Galena Mountain Caribou ACEC—wildlife • Hogatza River Tributaries ACEC—soil, water, fish/riparian • Indian River ACEC—soil, water, fish/riparian • Ishtalitna Creek Hot Springs RNA—soil, water, vegetation • Jim River ACEC—soil, water, fish/riparian, wildlife, cultural • Kanuti Hot Springs ACEC—soil, water • Lake Todatonten Pingos RNA—soil, water, vegetation • McQuesten Creek RNA—soil, water, vegetation • Nigu-Iteriak ACEC—	Manage the following areas to protect their relevant and important values (values identified): • Accomplishment Creek ACEC—soil, water, fish/riparian • Alatna River ACEC—soil, water, fish/riparian • Arms Lake RNA/ACEC—soil, vegetation • Galbraith Lake ACEC—wildlife, cultural, scenic • Galena Mountain Caribou ACEC—wildlife • Hogatza River Tributaries ACEC—soil, water, fish/riparian • Huslia ACEC—fish/riparian • Indian River ACEC—soil, water, fish/riparian • Ishtalitna Creek Hot Springs RNA/ACEC—soil, water, vegetation • Jim River ACEC—soil, water, fish/riparian, wildlife, cultural • Kanuti Hot Springs ACEC—soil, water • Klikhtentotzna Creek	Same proposed ACECs and values as under Alternative B but with less restrictive management (see proposed management below).	Manage the following areas to protect their relevant and important values (values identified): • Spooky Valley ACEC—wildlife, vegetation, scenic • Toolik Lake RNA—special status species, vegetation

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
	geologic, cultural • Nugget Creek ACEC—soil, wildlife • Nulato Hills ACEC—wildlife • Poss Mountain ACEC—soil, wildlife • Ray Mountains ACEC—wildlife • Redlands Lake RNA—soil, vegetation • Snowden Mountain ACEC—soil, wildlife, geology • South Todatonten Summit RNA—soil, water, vegetation • Spooky Valley RNA—wildlife, vegetation, scenic • Sukakpak Mountain ACEC—geology, scenic • Sulukna River ACEC—soil, water, fish/riparian, wildlife • Toolik Lake RNA—special status species, vegetation • Tozitna River ACEC—soil, water, fish/riparian, wildlife • West Fork Atigun River ACEC—soil, wildlife	ACEC—soil, water, fish/riparian • Lake Todatonten Pingos RNA/ACEC—soil, water, vegetation • McQuesten Creek RNA/ACEC—soil, water, vegetation • Mentanontli River/Lake Todatonten ACEC—fish/riparian • Midnight Dome/Kalhabuk ACEC—soil, wildlife • Nugget Creek ACEC—soil, wildlife • Poss Mountain ACEC—soil, wildlife • Ray Mountains/Tozitna River ACEC—soil, water, fish/riparian, wildlife • Redlands Lake RNA/ACEC—soil, vegetation • Sethkokna River ACEC—soil, water, fish/riparian • Snowden Mountain ACEC—soil, wildlife, geology • South Fork Koyukuk River ACEC—soil, water, fish/riparian • South Todatonten Summit RNA/ACEC—soil, water,		

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		vegetation • Spooky Valley RNA/ACEC—wildlife, vegetation, scenic • Sukakpak Mountain ACEC—scenic and geology • Sulukna River ACEC—soil, water, fish/riparian, wildlife • Toolik Lake RNA/ACEC—special status species, vegetation • Upper Kanuti River ACEC—wildlife, cultural • Upper Teedriinjik (Chandalar) River ACEC—soil, water, fish/riparian, wildlife • West Fork Atigun River ACEC—soil, wildlife • Wheeler Creek ACEC—soil, water, fish/riparian		
Arms Lake and Redlands Lake				
3.	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Allow access by permit for vehicles over 1,500 pounds gross vehicle weight (GVW).	Locatable minerals: Recommend withdrawal. ROWs: Exclusion area. Travel management: In summer, OHV use is limited to designated routes or trails.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: In summer, OHV use is limited to designated routes or trails.	No similar action; no ACEC or RNA would be designated.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Ishtalitna Creek Hot Springs and McQuesten Creek				
4.	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Allow access for vehicles over 1,500 pounds GVW by permit.	Locatable minerals: Recommend withdrawal. ROWs: Exclusion area. Travel management: In summer, OHV use is limited to designated routes or trails.	Locatable minerals: No restriction. ROWs: Exclusion area. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	No similar action; no ACEC or RNA would be designated.
Spooky Valley				
5.	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Allow access for vehicles over 1,500 pounds GVW by permit.	Locatable minerals: Recommend withdrawal. ROWs: Exclusion area. Travel management: Limited to designated routes or trails.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	Locatable minerals: No restriction. ROWs: No restriction. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).
Lake Todatonten Pingos and South Todatonten Summit				
6.	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Allow access for vehicles over 1,500 pounds GVW by permit.	Locatable minerals: Recommend withdrawal. ROWs: Exclusion area. Travel management: Limited to designated routes or trails.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	No similar action (no ACEC or RNA would be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Galbraith Lake				
7.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: Travel limited by State statutes.	Locatable minerals: Recommend withdrawal. ROWs: East-west avoidance area in southern portion; even so, any proposed ROWs must mitigate wildlife impacts and impacts on landscape connectivity. Travel management: Limited to designated routes and trails.	Locatable minerals: Recommend withdrawal. ROWs: Any proposed ROWs must mitigate wildlife impacts and impacts on landscape connectivity. Travel management: Limited to designated routes and trails.	No similar action (the ACECs would not be designated).
Dulbi River				
8.	Locatable minerals: Open. ROWs: No restriction. Travel management: No restriction.	No similar action (the ACEC would not be designated; a portion overlaps the Galena Mountain Caribou ACEC; see Galena Mountain Caribou).	No similar action (the ACEC would not be designated; a portion overlaps the Galena Mountain Caribou ACEC; see Galena Mountain Caribou).	No similar action (the ACECs would not be designated).
Galena Mountain Caribou				
9.	Locatable minerals: No restriction. ROWs: No restriction (all facilities should be temporary) Travel management: No restriction.	Locatable minerals: Recommend withdrawing moderate- to high-potential areas. ROWs: Exclusion area. Travel management: Closed during calving season (May 1–June 30); otherwise limited to designated routes or trails.	Locatable minerals: Recommend withdrawing moderate- to high-potential areas. ROWs: Exclusion area. Travel management: Limited to designated routes or trails.	No similar action (the ACECs would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Ray Mountains, Tozitna River, Tozitna Subunit North, and Tozitna Subunit South				
10.	*Tozitna River* Locatable minerals: Recommend withdrawing crucial spawning habitat. ROWs: No restriction (structures must be temporary). Travel management: No restriction.	*Ray Mountains/Tozitna River* Locatable minerals: Recommend withdrawing moderate- to high-potential areas and the 100-year floodplain. ROWs: Exclusion area. Travel management: Limited to designated routes or trails.	*Ray Mountains/Tozitna River* Locatable minerals: No restriction. ROWs: Avoidance area. Travel management: Limited to designated routes or trails.	No similar action (the ACECs would not be designated).
Upper Kanuti River				
11.	No similar action (the ACEC is not designated).	Locatable minerals: Recommend withdrawing moderate- to high-potential areas. ROWs: Exclusion area. Travel management: Seasonal limitation (closed during summer).	Locatable minerals: No restriction. ROWs: Avoidance area. Travel management: Limited to designated routes or trails.	No similar action (the ACEC would not be designated).
Hogatza River Tributaries, Indian River, Klikhtentotzna Creek, Sethkokna River, South Fork Koyukuk River, Upper Teedriinjik (Chandalar) River, Wheeler Creek				
12.	Locatable minerals: Recommend withdrawing crucial spawning habitat in Hogatza River Tributaries ACEC. ROWs: No restriction area. Travel management: No restriction.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: Seasonal limitation (closed in summer).	Locatable minerals: No restriction. ROWs: Avoidance area within 100-year floodplain. Travel management: Limited to designated routes or trails.	No similar action (the ACECs would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Accomplishment Creek, Alatna River, Mentanontli River/Lake Todatonten				
13.	No similar action (the ACECs are not designated).	Locatable minerals: Recommend withdrawal. ROWs: Exclusion area. Travel management: Seasonal limitation (closed in summer).	Locatable minerals: No restriction. ROWs: Avoidance area within the 100-year floodplain and exclusion area in known overwintering habitat or known spawning areas. Travel management: Limited to designated routes or trails.	No similar action (the ACECs would not be designated).
Jim River				
14.	Locatable minerals: Require plans of operation, with protective stipulations and mitigation measures, for all surface-disturbing activities; this is to avoid unduly affecting aquatic and riparian habitat or threatened, endangered, or candidate species (including plants and peregrine falcons), or affecting any other protected resource. ROWs: No restriction. Travel management: No restriction.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: Seasonal limitation (closed in summer).	Locatable minerals: No restriction. ROWs: Avoidance area within 100-year floodplain. Travel management: Limited to designated routes or trails.	No similar action (the ACECs would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Midnight Dome/Kalhabuk				
15.	No similar action (the ACEC is not designated).	Locatable minerals: No restriction. ROWs: ROWs for linear projects would require unimpeded Dall sheep passage in all their potential migration corridors. ROW applicants must provide scientifically defensible information to demonstrate that their proposed linear facility would not impede Dall sheep migration. Travel management: Seasonal limitation (closed in summer).	Locatable minerals: No restriction. ROWs: Any applicants for proposed ROWs must mitigate wildlife impacts and impacts on landscape connectivity. Travel management: Limited to designated routes or trails.	No similar action (the ACEC would not be designated).
Nugget Creek, Poss Mountain, Snowden Mountain, and West Fork Atigun				
16.	Locatable minerals: Recommend withdrawing mineral lick sites (160-acre mineral lick sites). Plans of operation with protective stipulations and mitigation measures would be applied to all surface-disturbing activities. This is to avoid restricting sheep movement, unduly disturbing sheep habitat, and affecting any other protected resource. ROWs: No restriction. Travel management: No restriction.	Locatable minerals: Recommend withdrawing mineral lick sites in a 0.31-mile (0.5-kilometer) radius. ROWs: Applicants for ROWs for linear projects would be required to provide for unimpeded Dall sheep passage in all their potential migration corridors. ROW applicants must provide scientifically defensible information to demonstrate that their proposed linear facility would not impede Dall sheep migration. Travel management: Poss Mountain and Snowden Mountain	Locatable minerals: No restriction. ROWs: Proponents of any proposed surface-disturbing activities must mitigate wildlife impacts and impacts on landscape connectivity. Travel management: Flight restrictions for aircraft associated with all BLM-authorized land use activities.	No similar action (the ACECs would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		seasonal limitation (closed in summer); Nugget Creek and West Fork Atigun, no restriction (default to *Restrictions Common to All Action Alternatives* in *OHV and Travel Management* section).		
Sukakpak Mountain				
17.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: No restriction.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: Limited to designated routes or trails.	Locatable minerals: Recommend withdrawal. ROWs: Avoidance area. Travel management: Limited to designated routes or trails.	No similar action (the ACEC would not be designated).
Sulukna River				
18.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: No restriction.	Locatable minerals: Recommend withdrawing moderate- to high-potential areas and 100-year floodplain. ROWs: Exclusion area. Travel management: Limited to designated routes or trails.	Locatable minerals: No restriction. ROWs: Exclusion area within 100-year floodplain. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	No similar action (the ACEC would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Toolik Lake				
18.	Locatable minerals: Closed per PLO 5150. ROWs: No restriction. Travel management: Access allowed via permit only.	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Seasonal restriction (summer closure).	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Seasonal restriction (summer closure).	Locatable minerals: Recommend withdrawal. ROWs: No restriction. Travel management: Seasonal restriction (summer closure).
Kanuti Hot Springs				
19.	Locatable minerals: Withdrawn. ROWs: No restriction. Travel management: No restriction.	Locatable minerals: Withdrawn. ROWs: Exclusion area. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	Locatable minerals: Withdrawn ROWs: Exclusion area. Travel management: No restriction (default to *Restrictions Common to All Action Alternatives*, as described in the *OHV and Travel Management* section).	No similar action (the ACEC would not be designated).
Nigu-Iteriak				
20.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: Closed, except for subsistence use.	No similar action (the ACEC would not be designated).	No similar action (the ACEC would not be designated).	No similar action (the ACEC would not be designated).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
Nulato Hills				
21.	Locatable minerals: No restriction. ROWs: No restriction. Travel management: No restriction.	No similar action (the ACEC would not be designated).	No similar action (the ACEC would not be designated).	No similar action (the ACEC would not be designated).

3.5 Recreation Management Areas

Goals

- The Recreation and Visitor Services Program will support a diverse array of recreation activities that enhances the quality of life for users.
- Facilitate greater well-being and economic benefits in communities. Support sustainable economic growth and assist with diversifying and stabilizing local communities by collaborating with community networks of service providers.
- Promote public health and safety by managing for accessibility of recreation sites and for clean facilities.
- Provide a variety of dispersed and developed recreation opportunities and experiences, while sustaining the recreation resources base and minimizing resource impacts resulting from recreation. Improve access to appropriate recreation opportunities on public lands, including partnered lands and waters.
- Provide infrastructure at public campgrounds, waysides, and visitor services sites, for a safe experience appropriate to the setting.

Objectives

- Establish a comprehensive approach to recreation planning and management that takes into consideration recreation that depends on management decisions.
- Enhance and expand, where appropriate, visitor services, including interpretation, information, and education.
- Ensure that visitors are not exposed to unhealthy and unsafe human-created conditions that have previously been identified, and improve the condition and accessibility, where appropriate, of recreation sites and facilities.
- To promote positive recreational experiences, encourage sustainable travel and tourism development and provide community-based conservation support for visitor services, by developing educational programs and literature, in partnership with native, local, state, private, not-for-profit, volunteers, special interests, and federal partners.
- Plan for and manage the physical, social, and operational settings in each area and the activities that occur there.

Overview

Recreation management areas are land units where recreation and visitor services objectives are recognized as a primary resource management consideration. In such areas, specific management is required to protect the recreation opportunities. The recreation management area designation is based on recreation demand and issues, recreation setting characteristics, use/user conflict resolution, compatibility with other resource uses, and resource protection needs.

A special recreation management area (SRMA) is an administrative unit where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance, or distinctiveness, especially as compared to other areas used for recreation. An SRMA is managed to protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics.

An extensive recreation management area (ERMA) is an administrative unit that requires specific management consideration to address recreation use and demand or recreation and visitor services program investments. An ERMA is managed to support and sustain its principal recreation activities and the associated qualities and conditions.

Under Alternative A, the Dalton Highway Corridor would continue to be managed as a single SRMA, according to the 1991 Recreation Area Management Plan for the area. Under Alternative B, the Dalton Highway Corridor would be split into three distinct SRMAs, while under Alternative C, the Dalton Highway Corridor would be managed as a single SRMA with nine recreation management zones. Under Alternative B, one ERMA would be designated, the Spooky Valley ERMA, and under Alternative C, both the Spooky Valley and Nigu-Iteriak River ERMAs would be designated. Under Alternative D, no SRMAs or ERMAs would be designated.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
1.	The Dalton Highway Corridor would continue to be managed as a single SRMA.	The Dalton Highway Corridor would be managed as three separate but geographically congruent SRMAs: • Arctic Circle SRMA (from Milepost 56 at the Yukon River Crossing to Milepost 0.0 at Gobblers Knob) • Koyukuk SRMA (from Milepost 132 at Gobbler's Knob to Milepost 235 at Farthest North Spruce Tree) • Arctic SRMA (from Milepost 235 at Farthest North Spruce Tree to Milepost 300	The Dalton Highway Corridor would be managed as one SRMA with nine separate recreation management zones: • Yukon River • Finger Mountain • Arctic Circle • Grayling Lake/South Fork Koyukuk • Chapman Lake • Coldfoot • Brooks Range South • Brooks Range North/Galbraith Lake • Outer Corridor	No SRMAs would be designated.
2.	No ERMAs would be designated.	Designate the Spooky Valley ERMA.	Designate the Spooky Valley ERMA and the Nigu-Iteriak River ERMA.	No ERMAs would be designated.

3.6 Off-Highway Vehicle (OHV) and Travel Management

Goals

- Manage and provide for motorized, nonmotorized, and mechanized access that would be in balance with resource protection and uses.
- Support inter-community access to public lands.

Objectives

- To avoid or minimize impacts from travel and OHV activities by managing for soil, water, air, vegetation, and riparian management objectives and indicators.
- Limit use in specific areas to protect the resource values in ACECs, preserve and protect the wilderness characteristics in the Wilderness Study Area, protect vegetation and soils to maintain watersheds and water quality, reduce user conflicts, and reduce harassment of wildlife and provide habitat security.
- Maintain and improve land health while promoting responsible use through active travel management. Within each Travel Management Area, designate a comprehensive travel management system that achieves resource management objectives, that provides appropriate, sustainable public and administrative access, that communicates with the public about opportunities, and that monitors the effects of use.
- Collocate trails with ROWs, where feasible.
- Establish a sustainable transportation system.

Overview

All public lands are required to have OHV area designations; therefore, the designation of areas as open, limited, or closed to OHV use is required for every BLM-managed acre within the planning area boundary. Alternative A would have some limitations on summer OHV use, while Alternative D would have even fewer limitations on summer OHV use. Alternative B would have the most limitations on summer OHV use, limiting use in areas such as ACECs and high-value watersheds. Alternative C would have similar limitations, but in fewer areas.

The BLM would ensure that rural residents engaged in subsistence uses shall have reasonable access to subsistence resources (ANILCA Section 811(a)) and would implement restrictions and closures to the use of snowmobiles, motorboats, and other means of surface

transportation traditionally employed for subsistence purposes by local rural residents (ANILCA Section 811(b)) only if the Authorized Officer determines that such use is causing or is likely to cause an adverse impact on public health and safety, resource protection, protection of historic or scientific values, subsistence uses, conservation of endangered or threatened species, or other purposes, values, and uses for which the lands are being managed under Federal Land Management and Policy Act or designated by ANILCA (such as a wild and scenic river, national recreation area, or national conservation area, if applicable).

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
1.	Utility corridor: Restrict OHVs to soils with low erosion hazard or to winter use, with adequate snow cover. Confine OHV operations to soils with low erosion potential or to times of the year when the surface is frozen to 1 foot (30 centimeters) and has sufficient snow cover to protect the integrity of vegetation ground cover. Allow access through RNAs for vehicles over 1,500 pounds GVW by permit.	**Common to All Action Alternatives:** • Adequate snow cover and freeze (6 inches of snow and 12 inches of freeze) would be required for snowmobile use, which means a combination of snow and frost depth sufficient to protect the underlying vegetation and soil. • Recreation and administrative use of registered unmanned aerial systems (e.g., drones) would be allowed, in conformance with Federal Aviation Administration and State regulations. Use of an unmanned aerial system for commercial purposes would need an authorization. Administrative sites would be closed to takeoff, landing, and operation of unmanned aerial systems. • Fixed-wing aircraft use would be allowed, except when otherwise restricted in this plan. Also allowed would be use of the associated hand clearing tools, such as handsaws, axes, and chainsaws, to clear rocks, down logs, and brush for maintaining landing strips. Other associated clearing requires approval from the BLM Authorized Officer. • OHVs would be limited to 1,500 pounds curb weight for winter and summer use without a permit.		
2.	Allow OHV access for research activities at Toolik Lake with a permit. Allow OHV use for subsistence purposes at Nigu-Iteriak only.	**Seasonal limitations** for OHV use (closed in summer) in the following areas: • ACECs o Accomplishment Creek o Alatna River o Hogatza River o Indian River o Jim River	**Seasonal limitations** for OHV use (closed in summer) in the following areas: • ACECs o Toolik Lake (except by permit) • Bluffs • Within 0.25 miles of hot springs	**Seasonal limitations** for OHV use (closed in summer) in the following areas: • ACEC o Toolik Lake (except by permit)

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		o Klikhtentotzna Creek o Mentanontli River/Lake Todatonten o Midnight Dome/Kalhabuk o Poss Mountain o Sethkokna River o Snowden Mountain o South Fork Koyukuk River o Upper Teedriinjik (Chandalar) River o Toolik Lake (except by permit) o Upper Kanuti River o Wheeler Creek • 100-year floodplain in any watershed • High value watersheds[6] • Bluffs • Within 0.25 miles of hot springs		
3.	Limit OHV travel to existing ways in Wilderness Study Areas.	Same as Alternative A.	Same as Alternative A.	Same as Alternative A.
4.	No similar action.	**Limit summer OHV** use to designated routes or trails, as follows: • ACECs o Arms Lake o Redlands Lake o Ishtalitna Creek Hot	**Limit summer OHV** use to designated routes or trails, as follows: • ACECs o Arms Lake o Redlands Lake o Galbraith Lake	No similar action.

[6]High value watersheds are those watersheds identified as high value fisheries.

Line #	Alternative A—Current Management *(No Action)*	Alternative B	Alternative C	Alternative D
		Springs o McQuesten Creek o Spooky Valley o Galbraith Lake o Upper Kanuti River o Jim River o Galena Mountain Caribou o Sulukna River o Lake Todatonten Pingos o Ray Mountains o South Todatonten Summit o Sukakpak Mountain	o Upper Kanuti River o Jim River o Midnight Dome/Kalhabuk o Hogatza River o Indian River o Klikhtentotzna Creek o Sethkokna River o South Fork Koyukuk River o Teedriinjik (Chandalar) River o Wheeler Creek o Accomplishment Creek o Alatna River o Mentanontli River/Lake Todatonten o Galena Mountain Caribou o Sukakpak Mountain o Sulukna River o Ray Mountains In the 100-year floodplain of high value watersheds, OHV use is limited to suitable corridors.	

4. How to Comment

The BLM will accept comments on this document through March 17, 2017. You may submit comments via e-mail (preferred), US Postal Service mail, or fax, to one of the following:

CentralYukon@blm.gov

Attn: BLM Central Yukon Field Office

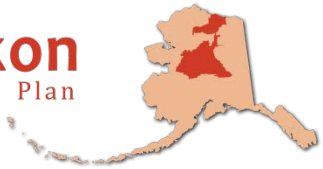
222 University Avenue

Fairbanks, AK 99709

Fax: 907-474-2282

Thank you for participating in the Central Yukon RMP/EIS planning process.

Central Yukon
Resource Management Plan



COMMENT FORM

The Bureau of Land Management invites you to express your views and share your concerns about the Central Yukon Resource Management Plan/Environmental Impact Statement (RMP/EIS). The Central Yukon RMP/EIS will provide future direction for approximately 13 million acres of BLM-managed land in central and northern Alaska including the Dalton Highway Corridor and the central Yukon River watershed. We are seeking public input on the Preliminary Alternatives Concepts for the RMP/EIS. We would appreciate receiving your comments by March 17, 2017.

Please leave this form in the comment box or mail it to the address which is preprinted on the back of this form. You may attach additional sheets if necessary. Comments and input may also be submitted by email to CentralYukon@blm.gov.

(Optional)

Name:

Representing (Self, Organization, or Agency):

Address:

City, State, Zip Code:

Email:

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

COMMENTS:

Thank you for your participation! Please add extra sheets if necessary.
To mail, fold along the dashed line on the back of this sheet and tape so that the address shows.

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_____

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Chel Ethun, Project Manager
Bureau of Land Management
222 University Avenue
Fairbanks, AK 99709

Central Yukon
Resource Management Plan

The Bureau of Land Management (BLM) invites you to attend a public meeting to discuss the **Central Yukon Resource Management Plan/Environmental Impact Statement (RMP/EIS).**

Please forward this to anyone you think may be interested!

Allakaket Public Meeting

When: Thursday, January 26, 2017

Time: 12:00 pm

Where: *Community Hall*

The BLM invites landowners, stakeholders, and the general public to a meeting to discuss the **Central Yukon RMP/EIS.**

This RMP/EIS will provide future direction for approximately 13 million acres of BLM-managed land in central and northern Alaska, including the Dalton Highway Corridor and central Yukon River watershed. We are seeking public input on the Preliminary Alternatives Concepts and development of the Central Yukon RMP/EIS. Attend this meeting to learn more about the planning process and to share your concerns.

For more information, please contact Chel Ethun at (907) 474-2253, email CentralYukon@blm.gov, or visit the project website: http://bit.ly/BLM-CYRMP.

If you need special needs accommodations, please contact Angel Rabon at (907) 261-9723 to make a request.

Notice for Public Meetings

The Bureau of Land Management (BLM) invites landowners, stakeholders, and the general public to a meeting to discuss Preliminary Alternatives Concepts for the **Central Yukon Resource Management Plan/Environmental Impact Statement (RMP/EIS).** This RMP/EIS will provide future direction for approximately 13 million acres of BLM-managed public land in central and northern Alaska, including the Dalton Highway Corridor and central Yukon River watershed. We are seeking public input on the Preliminary Alternatives Concepts and development of the RMP/EIS.

Attend a meeting to learn more about the planning process and to share your concerns. Comments and input may also be submitted by email to CentralYukon@blm.gov through March 17, 2017.

Additional meetings are currently being scheduled in the planning area in February and March 2017. For more information, please contact Chel Ethun at (907) 474-2253, email CentralYukon@blm.gov or visit the project website: http://bit.ly/BLM-CYRMP

Koyukuk Monday January 23, 2:00 pm, Community Hall

Galena Tuesday January 24, 6:00 pm, Larson Charlie Community Hall

Tanana Wednesday January 25, 5:30 pm, Community Hall

Allakaket Thursday January 26, 12:00 pm, Community Hall

Ruby Monday February 13, 5:00 pm, Community Hall

Anaktuvuk Pass Tuesday February 14, 5:00 pm, Community Hall

Lake Minchumina Thursday February 16; 11:30 am potluck, meeting at 12:00 pm; Community Library

Anchorage Wednesday February 22; 5:00 pm open house, followed by 6:00 pm presentation and comment period held at BLM Campbell Creek Science Center, located at 5600 Science Center Drive, Anchorage, AK
Listen at 6:00 pm – (888) 369-1427 access code 3740303

Fairbanks Monday February 27; 5:00 pm open house followed by 7:00 pm presentation and comment period held at the Morris Thompson Cultural and Visitors Center located at 101 Dunkel Street, Fairbanks, AK
Listen at 7:00 pm – (888) 369-1427 access code 3740303

Coldfoot and Wiseman Wednesday March 8, 1:00 pm, Arctic Interagency Visitor Center

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Bureau of Land Management
222 University Avenue
Fairbanks, AK 99709

P O Boxholder

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More information about the RMP/EIS and dates for additional meetings currently being scheduled in the planning area may be found on the BLM website: **http://bit.ly/BLM-CYRMP**

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For more information or to be added to the mailing list contact Chel Ethun at (907) 474-2253, or at CentralYukon@blm.gov

U.S. Department of the Interior
Bureau of Land Management

News Release

Bureau of Land Management, Fairbanks District Office, Public Affairs
222 University Avenue, Fairbanks, AK 99709-3816
Tel: 907-474-2231 Fax: 907-474-2238
www.blm.gov/alaska

FOR IMMEDIATE RELEASE **News Release No. 17-02**
Contact: Craig McCaa, cmccaa@blm.gov, 907-474-2231 **Date: Jan. 12, 2017**

BLM to Host Public Meetings for Central Yukon Land Use Plan

FAIRBANKS – To better prepare for developing the Central Yukon Resource Management Plan (RMP), the Bureau of Land Management (BLM) will host a series of public meetings from mid-January through mid-March 2017 to gather vital public input from the many users of public lands. This plan will guide management of 13.1 million acres of public lands in central and northern Alaska for the next 15 to 20 years.

The BLM will host meetings in 11 communities in the planning area and two additional meetings in Anchorage and Fairbanks. Staff from the Fairbanks District Office will engage communities in preparing a range of alternatives for the Draft RMP. A primary goal of community outreach is to ensure affected communities have a continued voice in the planning process. The complete meeting schedule is available at the project website at http://bit.ly/BLM-CYRMP.

Issues to be addressed at these public meetings include subsistence resources, mineral exploration and development, special management area designations, as well as other topics of interest to the public. Those unable to attend one of the meetings are encouraged to participate via BLM's project website (http://bit.ly/BLM-CYRMP), which includes maps, reports, and meeting materials. Comments and input may also be submitted by email to CentralYukon@blm.gov.

For additional information, contact Project Manager Chel Ethun at (907) 474-2253.

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The BLM manages more than 245 million acres of public land, the most of any Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's mission is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations. In Fiscal Year 2015, the BLM generated $4.1 billion in receipts from activities occurring on public lands.

Central Yukon
Resource Management Plan

Bureau of Land Management
US Department of Interior

Environmental Impact Statement

PROVIDING SUBSTANTIVE COMMENTS

The United States Department of the Interior, Bureau of Land Management (BLM), Central Yukon Field Office, is developing a resource management plan (RMP) and environmental impact statement (EIS) consistent with the National Environmental Policy Act of 1969 (NEPA) to address the management of resources in 13 million acres of BLM-managed land in central and northern Alaska, including the Dalton Highway Corridor and central Yukon River watershed. The BLM is currently offering the public the opportunity to offer feedback on the Preliminary Alternatives Concepts being considered in the Draft RMP/EIS. The Preliminary Alternatives Concepts can be accessed by attending a public meeting, or visiting the project website at: http://bit.ly/BLM-CYRMP. The project website also contains information on public meetings.

WHY PUBLIC COMMENTS ARE IMPORTANT

Public comment periods offer the opportunity for you, the public, to be involved in the BLM's decision-making process and to offer your thoughts on alternative ways for the agency to accomplish what it is proposing. In compliance with the BLM's new planning rule (known as Planning 2.0), the BLM is offering this comment period to gain early feedback on the preliminary alternatives. At this time, the BLM is specifically seeking comments on the range of the Preliminary Alternatives Concepts, the rationale for alternatives, and the basis for analysis of the alternatives.

The National Environmental Policy Act "… is intended to help public officials make decisions that are based on the understanding of environmental consequences…" [40 CFR 1501(e)]. To achieve this, the RMP/EIS will consider the effects of the BLM's actions on economic and natural resources within the planning area. Citizens such as yourself often have valuable information about places and resources they consider important, and the potential effects proposed federal actions may have on those places and resources.

PROVIDING EFFECTIVE COMMENTS

Comments that provide relevant and new information with sufficient detail are the most useful and are referred to as substantive comments. The BLM reviews all comments and identifies topics that are substantive for consideration in the final published document. Try not to provide comments that offer opinion only.

Substantive comments do one or more of the following:

- Raise issues the BLM has not considered or reinforce issues the BLM has already identified.
- Present information that can be used when developing alternatives and when the BLM considers impacts of alternatives.
- Present reasonable alternatives within the scope of the decisions being made.
- Recommend specific changes to current management.
- Question, with reasonable basis, the accuracy of information in a report already created.

Comments that are not substantive include:

- Comments in favor of or against an action without any reasoning (such as "I do/don't like ____" without providing any rationale).
- Comments that only agree or disagree with BLM policy.
- Comments that take the form of vague, open-ended questions.

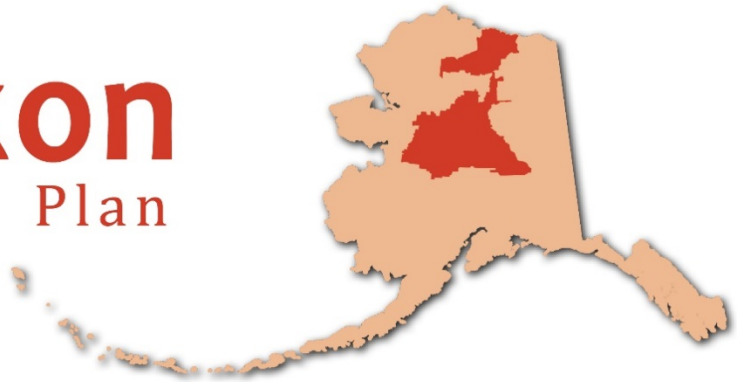
Please submit comments by
March 17, 2017

Comments can be mailed to:
Chel Ethun
BLM Fairbanks District Office
222 University Avenue
Fairbanks, AK 99709

Comments can also be emailed to:
CentralYukon@blm.gov

Access the preliminary alternatives concepts by attending a public meeting or visiting the project website at
http://bit.ly/BLM-CYRMP

Central Yukon
Resource Management Plan



Glossary

Preliminary Alternatives Outreach Period
January 17–March 17, 2017

Glossary

100-year floodplain. The area inundated by a flood event with a one percent chance of occurring in any given year.

Alaska National Interest Lands Conservation Act (ANILCA). A law passed in 1980 designating 104 million acres for conservation by establishing or expanding national parks, wildlife refuges, wild and scenic rivers, wilderness areas, forest monuments, conservation areas, recreation areas, and wilderness study areas to preserve them for future generations.

Alaska Native Claims Settlement Act (ANCSA). A law passed by Congress in 1971 to settle aboriginal land claims in Alaska. Under the settlement the Natives received title to a total of over 44 million acres, to be divided among some 220 Native villages and 12 Regional Corporations established by the act. The corporations shared in a payment of $962,500,000.

Areas of Critical Environmental Concern (ACEC). An area within the public lands where special management attention is required to protect important historic, cultural, or scenic values, fish and wildlife or natural systems or processes, or to protect life and safety from natural hazards.

Best management practice (BMP). A method, process, or activity, or usually a combination of these, that are determined by a State or a designated planning agency to be the most effective and practicable means (including technological, economic, and institutional considerations) of managing or controlling particular conditions or circumstances. BMPs are a suite of voluntary, accepted measures that may or may not be applied to or enforced for any given project.

Code of Federal Regulations (CFR). A codification of the general and permanent rules published in the *Federal Register* by the Executive Departments and agencies of the federal government. The Code is divided into 50 titles which represent broad areas subject to federal regulation. Each volume of the Code is revised at least once each year and issued on a quarterly basis.

Conservation System Unit (CSU). ANILCA defines a CSU as any Alaskan unit of National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument.

Leasable Minerals. Minerals subject to exploration and development under leases, permits, and licenses under various mineral leasing acts. Leasable minerals include oil, gas, and coal.

Locatable Minerals. Minerals subject to appropriation under the mining laws and 43 CFR 3809. Locatable minerals include base metals (e.g., copper, lead, and zinc), noble metals (e.g., silver and gold), nickel, iron, platinum group elements, bentonite, gem and semiprecious gemstones, and nephrite jade. See also leasable minerals.

Landscape Connectivity. The degree to which the landscape facilitates or impedes movement between resource patches.[1]

Wilderness Characteristics. Wilderness characteristics include the area's size, its apparent naturalness, and outstanding opportunities for solitude or a primitive and unconfined type of recreation. They may also include supplemental values. Lands with wilderness characteristics are those lands that have been inventoried and determined by the Bureau of Land Management (BLM) to contain wilderness characteristics as defined in section 2(c) of the Wilderness Act.

Extensive Recreation Management Area (ERMA). An administrative unit that requires specific management consideration to address recreation use and demand or recreation and visitor services program investments. An ERMA is managed to support and sustain its principal recreation activities and the associated qualities and conditions.

Environmental Impact Statement (EIS). A document required by the National Environmental Policy Act for certain actions significantly affecting the quality of the human environment.

Gross Vehicle Weight (GVW). The total weight of the vehicle plus the maximum loaded carrying capacity of the vehicle as specified by the manufacturer (i.e., GVWR = weight of vehicle + fuel + passengers + cargo, as per manufacturers limitations). Pull-behind trailers are not included in the GVWR calculation for the vehicle.

Off-Highway Vehicle (OHV). Any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: 1) any non-amphibious registered motorboat; 2) any military, fire, emergency, or law enforcement vehicle being used for emergency purposes; 3) any vehicle whose use is expressly authorized by the authorizing officer, or otherwise officially approved; 4) vehicles in official use; and 5) any combat or combat support vehicle when used for national defense (CFR 43 sec. 8340.05(a)). OHVs generally include dirt motorcycles, dune buggies, jeeps, four-wheel drive vehicles, snowmobiles, and ATVs. OHV is synonymous with Off-Road Vehicle (ORV), Utility Type (or Terrain) Vehicle (UTV), and All Terrain Vehicle (ATV). Aircraft are not OHVs.

[1]D'Eon, R. G., S. M. Glenn, I. Parfitt, and M.-J. Fortin. 2002. Landscape connectivity as a function of scale and organism vagility in a real forested landscape. Conservation Ecology **6**(2): 10. [online] URL: http://www.consecol.org/vol6/iss2/art10/

Public Land Order (PLO). Congressional or secretarial orders defining withdrawals of public lands by statute or secretarial order from operation of some or all of the public land laws.

Recreation Management Areas. Land units where recreation and visitor services objectives are recognized as a primary resource management consideration. In such areas, specific management is required to protect the recreation opportunities. The recreation management area designation is based on recreation demand and issues, recreation setting characteristics, use/user conflict resolution, compatibility with other resource uses, and resource protection needs.

Resource Management Plan (RMP). A blueprint explaining how the BLM will manage areas of public land over a period of time (generally 10-15 years). BLM Field Offices or District Offices prepare RMPs for the lands within their boundaries. RMPs contain decisions that guide future management actions and subsequent site-specific implementation decisions. RMPs establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives (management actions and allowable uses).

Research Natural Area (RNA). An area that is established and maintained for the primary purpose of research and education because the land has one or more of the following characteristics: 1) a typical representation of a common plant or animal association; 2) an unusual plant or animal association; 3) a threatened or endangered plant or animal species; 4) a typical representation of common geologic, soil, or water features; or 5) outstanding or unusual geologic, soil, or water features. Uses of RNAs are defined in 43 CFR 8223.1.

Right-of-Way (ROW). The right to pass through property owned by another such as the right to build and operate a railway line, highway, or pipeline on land belonging to another. **Avoidance area.** An area identified through resource management planning to be avoided but may be available for ROW location with special stipulations. **Exclusion area.** An area identified through resource management planning that is not available for ROW location under any conditions.

Special Recreation Management Area (SRMA). An administrative unit where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance, or distinctiveness, especially as compared to other areas used for recreation. An SRMA is managed

Scoping. The process used to determine, through public involvement, the range of issues that the RMP should address.

Subsistence Resources; Subsistence Use. Examples include use of cabins, shelters, airplanes, motorboats, snowmobiles, and temporary structures and equipment for subsistence hunting, fishing, and trapping.

Travel Management Area. Polygons or delineated areas where travel management (either motorized or non-motorized) needs particular focus. These areas may be designated as open, closed, or limited to motorized use and will typically have an identified or designated network of roads, trails, ways, and other routes that provide for public access and travel across the area. All designated travel routes within TMAs should have a clearly identified need and purpose, and clearly defined activity types, modes of travel, and seasons or times for allowable access or other limitations.

Top-filed lands by the State of Alaska. In 1958, the Alaska Statehood Act allowed the State of Alaska to select approximately 103 million acres of Federal lands for transfer to State ownership. Some Federal lands were withdrawn for various other purposes and were not available for selection. In 1980, ANILCA granted the State the right to file "future selection applications" on lands that were not available for selection in case they became available in the future. These future selection applications are called "top filings."

Withdrawal. Federal land set aside and dedicated to a present, governmental use; public land set aside for some other public purpose, e.g., pending a determination of how the land is to be used; an action approved by the Secretary or a law enacted by Congress that closes land to specific uses under the public land laws (usually sale, settlement, location, and entry), or limits use to maintain public values or reserves area for particular public use or program, or that transfers jurisdiction of an area to another federal agency. Usually enacted through a public land order or legislation.

Appendix B

Comments by Category

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APPENDIX B
COMMENTS BY CATEGORY

This appendix includes all comments received organized by category. A total of 62 written submissions, resulting in 953 discrete comments, were received during the comment period. Each meeting transcript was counted as a separate submission. Some of the 953 comments were coded into multiple code types, resulting in 1,164 coded comments. See **Section 2**, Comment Summary, for more information.

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Table B-1
Alternatives

Alternatives – General (not resource related)
Alternative A
Maintaining the Dalton corridor and its integrity and prohibition of ORV use has been and will continue to be, in my opinion, of vital importance in maintaining the wild character of lands adjacent to it. But the plan is only as good as the enforcement of its provisions for protection.
Alternative B
There should be a habitat connection between the three conservation system units mentioned above.
Alternative B and Alternative D is all or nothing and really not management. BLM should reconsider this.
On alternative themes, is there any reason that in alternative B you went with "resource values" and in alternative C you went with "resource uses"? A value could be like wildness with very little use? Why are there different words for B and C?
Alternative C
On alternative themes, is there any reason that in alternative B you went with "resource values" and in alternative C you went with "resource uses"? A value could be like wildness with very little use? Why are there different words for B and C?
Alternative D
Alternative B and Alternative D is all or nothing and really not management. BLM should reconsider this.
New Alternative
I recommend a substantive comment regarding current management to keep LEOs out of Wiseman, away from mining claims, and off of State lands.
We reject any more changes except relaxing extreme environmental mindset as the lands are transferred to the State and People.
To the maximum extent possible, maintain the region's natural and wild qualities.
Minimize areas available for mining.
Also request the Big Salt & Little Salt watersheds be protected from any adverse impact such as mining the water quality is essential as they are salmon spawning waterways.
The existing state land selections should be given more prominence and thought.
Galena is pursuing a biofuel project for the school and will need to harvest timber. Areas to consider are within a 50 mile radius of Galena. BLM needs to consider this in the range of alternatives. Galena has a current timber sale area that are on corporate lands (split between Doyon and Gana-A'yoo lands – Gana-A'yoo manages sub surface rights); areas of BML, trail that goes toward Galena mountain, village is interested in looking at timber sale contracts. Look at a river crossing toward south and loop back. Galena has done a feasibility study of timber done in a 25 mile radius of village center (timber cruising, historical data, areal imagery), however with long range harvest plan, additional studies are not done as of yet.
Ruby would like to consider reindeer grazing on lands outside of Ruby. No formal plans but would like the option.

Table B-1
Alternatives

BLM should consider a development with Melozi Hot Springs and involve the tribes for some sort of commercial development to capitalize on the visual and recreational resources.
In the last 15 years of maintaining weather data, it is rare for a full 12 inches of freeze down to occur. This is an unreasonable restriction, BLM should reconsider the freeze down for lands. Agricultural depth of 4 inches is more typical.
I encourage you to divide the plan into its geographic areas. It is complicated. It is hard to read these and the maps should reflect the three geographic areas.
I was really glad in the Eastern Interior plan when BLM divided it up to make records of decisions and I think that there some very distinct decisions that could be divided up in this plan.
Seems to me there is a large chunk of land, to lump everything into 4 alternatives. Wouldn't it make more sense to be more localized and break into smaller districts. Would the plan come together quicker if these were more localized? Would decisions be made quicker?
Protect areas so they can continue to subsistence hunt.
I would also like to see a Tribally driven Alternative.
I would also advocate on Alternative E which would follow a holistic approach. That is to say that human use of the lands in question is no more or less a consideration than what is in the best interest of all in a very inclusive sense. They all would include the many species of animals and plants. Corridors at access between conservation units would be maintained for migratory species. In many cases this follows lands already in a "defacto" wilderness category. A holistic approach would take into consideration that decisions on BLM & other lands adjacent can have consequences for other land holder. This would require a coordination and consultative approach prior to any decisions being made.
In the absence of a plan, maintaining what is already present w/o further degradations is important requiring, much as I suggested under a holistic approach, namely coordination and advance consultations where decisions made on BLM lands may affect other users downstream.
Mineral extraction if it is to occur most wholly contain contaminants so this kind of consequence cannot happen.
Would like to see a no-disturbance buffer of one township wide left around CSU boundaries.
How will BLM protect the sensitive/confidential nature of traditional use areas Information and mapping shared by the community?
I would like to see BLM land east and north of Galena (specifically Bear Creek) protected from any large scale development because of its importance for subsistence. The area is an important area for hunting and trapping for the residents of Galena. It is also a documented King Salmon spawning stream.
Until the carbon and Methane sequestering nature/ abilities that these permafrost areas offer No Development or disturbance of any kind should be considered. We must investigate all the science before we risk stimulating the release of these vast quantities of greenhouse gasses.
Rather than focusing on fuel extractions that will only add to our CO_2 impact we should explore identification of these areas as carbon sink areas and keeping them in tack for their ability to sequester CO_2.
Biodiversity protection must be fully considered in any development plan.

Table B-1
Alternatives

Herd migration and grazing must be protected for herd and eco system health, including all natural plant and animal species.
All waterways must be maintained for their essential contributions to ecological balance. This includes the ecology of the streams as well as the biosphere surrounding the streams.
Native community's traditional usage of these areas must not be impacted. This includes extended areas that may need to be resourced as more recently used areas shift in their ability to provide food security.
Development areas must never be out of balance with the virtues of conservation.
The planning area holds some of the last remaining such lands and its imperative they be protected as wilderness or as a backcountry management area.
Not providing caribou large connections in which to migrate would likely negatively impact the health and size of the herd.
We urge the Bureau to include rivers and major tributaries within these outer corridor lands as part of its review of rivers.
Doyon urges BLM to develop an RMP that does not designate any new Wild and Scenic Rivers, lands to be managed for wilderness characteristics, or ACECs in the vicinity of Doyon landholdings or selections, unless Doyon specifically-through consultation and/or comments-advises BLM that such designation does not raise concerns.
Kilolitna River –Combined with the geothermal springs found in the drainages, remote scenic setting, and spawning areas for chinook and whitefish, this river drainage is worthy of special protection.
I feel there needs to be protected areas between the National Wildlife Refuges and the National Parks to create safe corridors for wildlife movement. Two important ones through the Dalton corridor include Kanuti to Yukon Flats, and the Arctic National Wildlife Refuge to Gates of the Arctic National Park and Preserve.
Please provide for protection of the Dalton Highway scenery.
The water drainages that pass through this corridor need to be protected. Rivers like the Kanuti are important for waterfowl breeding and fishes. It is a whole habitat that needs to stay connected and protected.
The analysis should expand considerably on resource management decisions more specific to individual communities. Future land decisions that potentially affect Native villages ought to be couched with respect to Tribal traditional land domains and historic and contemporary customary use areas. Through continuing dialogue with each affected federally recognized Tribal government, relevant values will evolve in the planning process to address long-term community interests in the broad theme of multiple uses of public lands.

Table B-1
Alternatives

In order to address concerns of rural residents in Native villages, the analytical framework should expand considerably on resource management decisions more specific each villages. The framework for rural land management conservation may consider amending the use of ACEC to customary and traditional use areas and wild food harvest zones. Future land decisions that potentially affect Native villages ought to be couched with more respect to tribal traditional land domains. Through continuing dialogue with each affected rural village and federally recognized Tribal government, relevant sentiments and values will evolve with the planning process to address long-term community interests to conserve wild food resources in the broad theme of multiple uses of public lands.
Working with Tribal leaders and Tribal members, in coordination with your resource staff, TCC resource staff will develop a provisional, Rural Village alternative and submit a written concept paper to your office on or before April 30, 2017.
I expect tourism to increase, and it should be supported by careful development along the Dalton Highway Corridor.
Because water quality can have a huge impact on existing refuges, it is important to have a conservation buffer zone of federal protection from mineral extraction around all national wildlife refuges and Gates of the Arctic Nation Park. Clean and healthy watersheds should be a priority.
Attention should be paid to international migratory treaties that pertain to some of bird populations.
Healthy subsistence resources are important to communities in this area and one more reason to maintain healthy water systems and habitat for wildlife populations. Connection corridors make sense to provide for wildlife movement and to support resilience of populations subject to changing climate and habitat.
An application of a conservation matrix model to determine how the existing conservation system units and adjacent BLM lands can serve as ecological benchmarks. We recognize that BLM is in charge of multiple use management across a spectrum ranging from intensive resource extraction/development to conservation. This is the "matrix" of various land uses. The Boreal Ecosystems Analysis for Conservation Networks (BEACONS) project shows how the BLM can utilize existing CSUs, and some nearby BLMs lands, as ecological benchmarks that would better enable evaluation of impacts from permitting actions on BLM multiple use lands. The CSU benchmarks would act as experimental "controls" for comparison of a suite of management actions ranging from intensive resource developments to management for conservation by using an adaptive management scheme. This is a truly landscape-scale cooperative approach across agencies and is a good example of landscape management in action.
Finally, as the primary manager of the federal Subsistence Program, the FWS urges the BLM to prioritize the importance of maintaining habitat productivity and connectivity in areas that support valuable populations of fish and wildlife that are relied upon for subsistence by the residents of rural Alaska villages living near BLM-managed lands. further, these residents also rely on refuge lands for subsistence, and we ask that BLM strongly consider the effects of their actions on upstream watersheds that may affect downstream refuges that are important for subsistence.

Table B-1
Alternatives

After reviewing the conceptual models and maps presented during the Fairbanks open house (February 27, 2017), it does not appear that the results from the Boreal Ecosystems Analysis for Conservation networks (BEACONS) model were incorporated as an underlying framework from which to inform the conceptual alternatives for the Central Yukon planning region. We understand the challenges of presenting this framework to the public; however, the opportunity still exists for BLM to introduce the BEACONS landscape Conservation Matrix Model (CMM) planning approach in the draft RMP to be developed. Application of CMM elements will allow planners, cooperators, Tribes and the public to identify priority conservation areas, as well as areas where sustainable development could occur.
We recommend the BLM work with FWS and the Northwest Boreal Landscape Conservation Cooperative to select a variety of Conservation Matrix Model data elements (ecological benchmarks that meet Minimum Dynamic Reserve sizes) which would vary across the alternatives and provide a fundamental base layer on which each of the alternatives could be further developed using more traditional means. The BEACONs team has been working iteratively for months with BLM CY planners and staff to tailor the products to the needs of the agency. The data are complete and are available, therefore we are not requesting the BLM undertake a new analysis. We believe this process could help make the alternative development process more efficient and ultimately, more clear to the public.
Maintaining and restoring landscape connectivity is one of the main recommended climate adaptation actions (Heller and Zavaleta 2009, Biological Conservation). Magness and Robertson (2016) identified core areas, commonly referred to as landscape linkages, that connect the federal conservation estate across the Northwest Boreal Landscape Conservation Cooperative area (Figure 1). We recommend that the BLM use results from Magness and Robertson (2016) as primary criteria for the selection of the most appropriate ecological benchmarks that should be included as a range among all of the alternatives.
It is clear is that BLM-administered lands are integral to maintaining landscape connectivity among all interior Alaska CSUs and are especially important for providing flow of resources between the Yukon Flats and Kanuti NWRs and the Arctic National Wildlife Refuge and Gates of the Arctic National Park and Preserve (Magness and Robertson, 2016), our specific areas of interest. Using this method, a very small area of BLM lands have a disproportionately large conservation impact. This is one of the best examples of landscape-scale planning and management that we can show on-the-ground outcomes and can gain national notoriety.
Alternative Concept 3.1 - Locatable Mineral Entry Incorporating results from the BEACONS project as a framework from which to determine allocation patterns, including locatable mineral entry, will minimize conflicts between resources and resource uses while still allowing for ecologically sustainable development within the overarching conservation matrix and allow BLM to meet its goals and objectives for this resource use.
BLM plays an important role in increasing climate resilience and adaptive capacity of our landscapes. Maintaining and restoring landscape connectivity is the number one recommended climate adaptation action; by identifying core areas for landscape connectivity now, we have a better chance of preventing loss of connectivity and the need for restoration in the future. We reiterate the use of various landscape-scale planning and design approaches/tools that have already been employed to inform this plan, including the Conservation Matrix Model to create a framework that maintains flexibility in achieving regional conservation goals in the face of uncertainty, while still allowing for sustainable development.

Table B-1
Alternatives

The early concept alternatives do not adequately recognize the critical importance of watershed health in providing for subsistence, on Koyukuk NWR, and on the BLM lands that surround the refuge. These watersheds form one system, on- and off- the refuge, that people residing in the villages of Hughes, Huslia, Koyukuk, and Galena rely upon. Actions that diminish watershed health will affect the ability of these systems to provide adequate subsistence opportunity. By following our recommendations in the above paragraphs, you will enable the systems to continue to provide for subsistence.
We appreciate the objective to maintain connectivity between the CSUs. The Service recommends considering connectivity among all the CSUs. Connectivity and corridors provide opportunity for wildlife movement, maintains available habitat among all CSUs, and preserves genetic cohesion for populations. See the comments from Kanuti NWR for analyses and suggested methods for implementation. Connectivity models using methods robust to climate change are currently available for BLM to use.
Combination of Alternatives
The alternatives, to get a full range of values need to do a little bit more of an integrated approach of the resources and what their impacts may be otherwise there is no real range.
Question if there can be a mix and match out of the alternatives in the end.
Please give the villages the land they need to maintain their subsistence activities.
Subsistence caribou hunting closures west of the Dalton Highway near the BLM's western borders (WSA16-01 and WSA17-02) closed massive swathes of federal public lands for hunting caribou and moose. We would like to see an Alternative that adequately addresses the anticipated huge increase in public use and hunting demand along the Dalton Highway and elsewhere in the planning area. There is a current land-use crisis happening in the region west of this planning area. BLM should consider how these closures will negatively affect this planning area and its borders to the north and east.
As BLM works to develop alternatives for public comment in the draft RMP/EIS, Doyon urges the agency to ensure that any action alternatives to be presented for public review and comment and to be considered by the agency in the future reflect realistic potential development scenarios and not bias commenters against development by presenting unreasonable alternatives that reflect extreme and unforeseeable potential outcomes.
The Northern Alaska Environmental Center held two public meetings leading up to the comment period and at those meetings our members and the public noted these general concerns: • Subsistence—that the landscapes be managed to ensure subsistence priority. • Intact watersheds—to best protect fish spawning habitat. • Connectivity—to create landscape connectivity between existing conservation units.
Numerous CSUs exist within and next to the planning area. These tracts include, but are not limited to, the Nowitna, Innoko, Koyukuk, Kanuti, Selawik, Arctic, and Yukon Flats National Wildlife Refuges and Gates of the Arctic and Denali National Parks and Preserves. To ensure the unique values of these conservation areas, special consideration must be given to lands and waters that adjoin and connect these tracts. A concerted effort should be made within this resource management plan to ensure compatible uses and connectivity between these administrative units. Protecting CSU values through ACEC designation or by identifying and managing for wilderness values on BLM lands would be a constructive future feature of this planning effort.

Table B-1
Alternatives

Within the development of this resource management plan, lands and waters of high ecological and cultural value should also be analyzed, identified, and recommended for inclusion into BLM's National Landscape Conservation System. This analysis should include, among others, a review for potential national conservation areas, outstanding natural areas, and wild and scenic rivers. (Section 5(d)(1) of the National Wild and Scenic Rivers Act, for example, specifically directs federal agencies to identify potential additions to the National Wild and Scenic Rivers System through federal agency plans.)
To proactively manage for the impacts of an unknown future climate, we encourage BLM to use sound and proactive adaptation strategies for wildlife management and biodiversity conservation.
We urge BLM to select alternatives and management actions that, complement, not conflict, with ANILCA mandates of Kanuti National Wildlife Refuge and the six other refuges near the planning area.
Absent such withdrawals, we urge BLM to invoke stringent permitting so watersheds upstream of these seven refuges so they remain contaminant-free to ensure the water quality/quantity that is the lifeblood of subsistence and recreational use.
We believe the RMP should specify tools to maintain wildlife corridors including: consolidating federal ownership, right-of-way exclusion areas, designated wildlife crossings and fish passages, mineral entry withdrawals, and stringent permitting.
The Refuge Association and Friends urge BLM to recognize the entire Kanuti River drainage, including the Kilolitna, as a high-value watershed for its fisheries productivity, subsistence, and recreational values and withdraw it from mineral entry. While RMP identifies BLM areas with high-value fisheries, the Refuge Association urges BLM to look at a landscape/watershed-wide scale since BLM watersheds contribute flows into Kanuti National Wildlife Refuge and affect habitats of the Kanuti and Kilolitna watersheds.
We support the concept of landscape connectivity and avoiding habitat fragmentation.
We recommend the BLM identify the human activities of concern to migration and identify the wildlife species that are at risk. We also recommend BLM identify areas that are considered important for habitat connectivity and wildlife movement, rather than assuming all areas between CSUs provide habitat connectivity or corridors for wildlife movement.
Providing connectivity does not necessarily mean human activities need to be excluded as most activities will have no effect on maintaining the connectivity or on wildlife movements. For instance, encounters with one or two snowmachines would not mean a caribou herd would not reach its calving grounds. Designating vast areas dilutes the effectiveness of managing unique areas where real migration issues may exist.
Key focal species is one of three major themes for the alternatives; however, there is no explanation of what the key focal species are, why they are considered key focal species, or what key focal means. We request BLM explain this theme.
Creation of high priority watersheds were based on fish diversity indices. We recommend they be expanded to include watersheds that have high ice-content soils (e.g., Todatonten ACEC's).

Table B-1
Alternatives

A land facet analysis that identifies the most important BLM lands that presently connect habitat between established conservation system units. Connectivity is the number one recommended action to increase resiliency in the face of a changing landscape. In the rest of the country connectivity is being restored. We have a collective opportunity to keep Alaska connected and prevent the environmental catastrophes we see elsewhere. We recommend that the RMP prioritize habitat connectivity areas through special designation and management actions. This could include priority retention of federal ownership, right-of-way exclusion areas, careful design of wildlife crossings and fish passages, locatable mineral entry withdrawals, and/or stringent permitting. These types of designations and actions for a very small amount of BLM lands will have a much larger conservation impact as the full federal conservation estate is leveraged, allowing a much larger portion of BLM lands to be managed sustainably for multiple uses.
We describe our subsistence concerns throughout this document. We recommend that a separate alternatives concept be developed to address subsistence activities and impacts because the BLM lands play such an important role in providing for subsistence. Furthermore, if not managed properly, decisions made in this RMP would not only impact subsistence capabilities on BLM lands but also on adjoining CSUs. Foremost to consider relative to potential lifting of the PLO 5150 withdrawal is its impact on subsistence opportunity. The rural priority could be diminished in areas where it is critical to some villages. BLM should have a goal of making sure there is not a confusing pattern of varying state/federal jurisdiction in critical subsistence areas.
Similar to subsistence, the issue of invasive species occurs across all five of the preliminary alternative concepts. The threat of invasive species, particularly Elodea, whitesweet clover, and bird-vetch, is so great that the draft EIS should contain a range of alternatives describing differing levels of invasive species prevention, management, and eradication. The Dalton Highway corridor is highly infested with white-sweet clover, and bird-vetch. An area along the Tanana River down from Nenana, near BLM lands, has an Elodea infestation. The past history of spread, and the extreme impacts that could occur to BLM lands or adjacent CSUs, dictate that the issue should not be delayed for a subsequent step-down plan. Kanuti staff recommend that the CYRMP specify invasive species early detection and rapid response, and eradication, if appropriate, as part of every multiple use decision in the RMP.
Inherent in multiple use decisions is the potential for conflict, especially as mineral and transportation development are overlain on the landscape. In the EIS there should be a discussion about how each alternative concept can complement/augment, or conflict, with one another (e.g., locatable minerals permitting vs withdrawals, realty decisions -- including large-scale land transfers/disposals vs retention as federal). Lands with Wilderness Characteristics (LWC), ACECs, and designated recreation areas (SRMAs and ERMAs) can strongly complement one another. The EIS should describe in detail how conflicts caused by multiple-use land permitting decisions can be resolved.
During the November and December 2016 Planning Workshop Meetings, multiple matrices were presented and discussed, including wildlife, special status species, fish and aquatics, water and vegetation. There does not seem to be any reference to these matrices in the Preliminary Alternatives Concepts draft document. The Service would appreciate clarifying the difference between "concepts" and final "alternatives," as well as when the remaining categories in the matrices will be available for comment.
The Service also welcomes the stated objective to ensure adequate and timely reclamation of both placer and hard rock mine sites and the recognition that current recovery practices and Best Management Practices (BMP) are insufficient.

Table B-1
Alternatives

Alternatives – Locatable Minerals
Alternative A
To make each alternative clearer to the public we recommend you first provide the reader a baseline in alternative A from which they can then compare the different allocations across alternatives. Alternative A should have the following listed separately: a) Acres open to locatable mineral entry b) Acres withdrawn from locatable mineral entry c) Acres recommended (from the last plan revision) for withdrawal from locatable mineral entry Also, consider removing the term "recommended" in the no action alternative since areas are either currently open or withdrawn.
Alternative Table Line #1: The Service recommends the BLM provide the total acreage already developed or permitted for locatable mineral extraction. The acreage already developed or permitted will be helpful when comparing alternatives, and help the reader understand the current status of developed areas in the CYRMP. The Service believes the acreage is small relative to the overall size of the CYRMP; an actual value can provide perspective to the proposed alternative acreages slated for withdrawal or open status. The Northwest Boreal Landscape Conservation Cooperative has developed an anthropogenic footprint map for Alaska, which could help in this effort.
Alternative B
AMA opposes, and BLM should not go forward with Alternative B, as it completely fails to meet BLM's multiple use mandate as required by the Federal Land Policy and Management Act (FLPMA). Under Alternative B very little land with resource development potential is available for exploration and possible development, and public access opportunities are greatly curtailed, particularly through the introduction of large areas where any developed access is prohibited by "Right of Way Exclusion Areas."
Alternative B meets most of these requirements, however we would like to see the entirety of the upper Kanuti River drainage withdrawn from mineral entry.
We strongly encourage creation of specific ACES's, including the "Jim River" ACEC. In fact, expanding this ACEC to the north along its northwest edge to abut NPS lands in GAAR would promote ecological connectivity between conservation units (GAAR NPS lands, BLM ACEC, Kanuti NWR). It would also provide means to control use along proposed Ambler Road corridor, which would cross these lands. It is good to see this area recommend for withdrawal from locatable mineral entry in Alternative B.
Among the proposed alternatives, only Alternative B excludes the lands and waters in question from mineral development. We strongly recommend protecting BLM areas that impact Selawik National Wildlife Refuge, a downstream CSU, from mining development to ensure our ability to meet the requirements of ANILCA and other laws.

Table B-1
Alternatives

We suggest important watersheds and habitats be represented in multiple alternatives because of their value. We recommend including the following watersheds / basins, and a map from Alternative A in Alternative B, for a wider range of alternatives: • Nulato River watershed • Kaltag River watershed • Bear Creek Drainage Basin • Kala Creek and Branch Creek drainage basin
Similarly, we suggest important wildlife areas and the need for buffers also be represented in multiple alternatives because of their importance. We recommend Alternative B include the following for a wider range of alternatives: • Restricted use buffers around all CSUs. • Redlands Lake • Galena Mountain Caribou ACEC
Providing a map depicting the high-value watersheds listed in Alternative B to help assess the alternatives on Line# 3.
Providing a map of potential mineral areas overlaid by the potential and permitted development (Alternative B).
Alternative C
In scenario C, it looks like BLM is trying to make it OK for the gas lines.
For the very highest-value watersheds and 100-year floodplain areas, Alternative C should include some withdrawals to locatable mineral entry. There is only a minimal amount of watersheds recommended for withdrawal on the periphery of Kanuti in Alternative C. We recommend that Alternative C include a buffer of locatable mineral withdrawals that is at least one township wide, or at least one small watershed unit long (e.g., hydrologic unit code (HUC) 12), that would surround the boundaries of all CSUs. The most valuable fisheries and subsistence areas should be withdrawn from mineral entry in all but Alternative D.
Buffers around sensitive or critical areas, such as wildlife breeding or wintering habitats, rivers, and wetlands, lessen the impacts of human activity and land disturbance. Mines, roads and pipelines reduce and fragment habitat impacting migration, foraging and nesting for fish and wildlife. Changes in land cover can also have a negative impact on water quality and watershed health. Ecological buffers may be used to reduce or minimize the risks of land use disturbance and proximity of infrastructure specifically associated with development. We further suggest Alternative C include: • Restricted use buffers around all CSUs.
We support in Alternative B the withdrawal from mineral entry of lands within high-value fisheries watersheds that feed Koyukuk NWR's anadromous fish-bearing streams. In particular, we are concerned that BLM make a strong commitment in the RMP to maintain water quality and quantity flowing off BLM lands and onto Koyukuk NWR in the following important watersheds: Indian River, Hogatza River, Dakli River, Wheeler Creek, Billy Hawk Creek, N. Fork Huslia River, Dulbi River, and Bear Creek/Whakatna Creek. We would like to see these withdrawals carried forth into Alternative C, because they feed valuable fish streams within a Conservation System Unit (CSU).

Table B-1
Alternatives

We support in Alternative B the withdrawal from mineral entry of lands within high-value fisheries watersheds that feed Nowitna NWR's anadromous fish-bearing streams. In particular, we are concerned that BLM make a strong commitment in the RMP to maintain water quality and quantity flowing off BLM lands and onto Nowitna NWR in the following important watersheds: Lost River, Our Creek, Flint Creek, Sulukna River, Telsitna, River, and Titna River. We would like to see these mineral withdrawals carried forth into Alternative C, because they feed valuable fish streams within a Conservation System Unit (CSU).
We support in Alternative B the withdrawal from mineral entry of lands within high-value fisheries watersheds that feed Innoko's NWR's anadromous fish-bearing streams (Eddie Creek). In particular, we are concerned that BLM make a strong commitment in the RMP to maintain water quality and quantity flowing off BLM lands and onto Innoko/Kaiyuh Flats NWR in the following important watersheds: Eddie Creek, Camp Creek and Bonanza Creek. We would like to see these withdrawals carried forth into Alternative C, because they feed valuable fish streams within a Conservation System Unit (CSU).
Alternative D
Alternative D is more favorable to development which sets up an all or nothing approach; I would like to see Alterative D is less than 100% such as 80% range.
New Alternative
…just north of Cold Foot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
All areas should be closed to mineral entry.
Allowing exploration provides massive, often foreign companies a foot in the door with which they will exploit the resource, move Alaska's resources outside our state, and leave a permanently scarred landscape behind for us to deal with and clean-up. If locations must be identified specifically, I'd urge the BLM to provide special protection to the Ray and Hodzana Mountains to protect a small but important and unique caribou herd; lands that drain into Refuges and Parks to ensure their water quantity and quality are protected, forever; and all lands around Sukakpak Mountain north to Toolik Lake Field Station because of their unparalleled wilderness character and truly amazing ready access to a backcountry experience in stunningly beautiful and pristine landscapes.
In discussing maintenance of water quality in downstream CSU's, Kanuti National Wildlife Refuge (NWR) is mentioned, however, GAAR, Koyukuk NWR, and Yukon-Delta NWR are not. These areas could also be adversely affected by mineral extraction. We suggest expanding the language in this section to include all CSU's in the region or else set limits to the downstream influences.
Combination of Alternatives
The currently closed-to-mineral entry zone surrounding the TAPS corridor needs to be re-examined. Is currently up to 5 mi- wide one each side of pipeline. I believe that could be narrowed to encourage further mining/mineral exploration and not threaten the pipeline.

Table B-1
Alternatives

How did BLM determine what is open for mineral entry and what would not be?
In alternatives for locatable minerals, there are options that show retaining or lifting withdrawals. Don't you need an act of congress for instilling withdrawals on anything over 25,000 acres? Is it realistic to think that congress will act? Is that a feasible alternative?
Areas open to mineral entry (for the purposes of exploration or development) shall not be unreasonably restricted.
Pursuant to statutory authority, miners shall continue to have access to develop their lode, placer, and mill claims. Adjustments and assessments should occur which analyze the potential for new mining in certain areas.
Regarding C & D- expanding for mineral entry to the east of the corridor in the lands toward Venetie, how can you regulate/assure the drinking water and water quality for fish of those waters downstream will not affect the residents of Venetie?
Mineral Potential maps – Alt A shows Venetie block closed to mining (current situation), why is it necessary to show this same area as withdrawn under Alt B-C (partial)?
How would the Tribe/BLM wort together to define me level and location of mining development that would be good for the community?
I would like to see BLM retain all protections against mining and improve such protections wherever possible. The entire planning area acts as an important bridge among multiple Refuges and Parks. As such, any mineral exploration or mining is likely to cause permanent harm to the habitats in this important area, with downstream effects on water quality, hydrology, habitats, and ultimately the fish and wildlife resources that I, as an Alaskan outdoorsman, fisher, and hunter, deeply value.
We would like to see BLM increase the amount of acreage that is withdrawn from mineral entry, and we prefer the PLO 5150 corridor remain closed to new mineral entry.
We recommend all lands that drain into all USFWS Refuge lands be closed to mineral entry and mining exploration, which will allow the USFWS to manage these public lands in accordance with federal policy.
Focus of mineral entry should be in areas that have viable geology for mineral location. Metamorphic schist belts in the Brooks Range, and other high potential zones to south of the Range should be a central focus for mineral location. Skagit limestone, sedimentary, and low--grade mineralization areas should not be open to location.
An example of low potential geology would be from the metamorphic contact zone just south of Sukakpak Mt. to the north through the sedimentary structures of the Northern Brooks Range. This zone has low mineral potential, but high scenic, as well as ACEC, and other values, there for those lands should not be open to mineral entry.
ACECs in areas of locatable mineral can have mitigations for mineral extraction.
Under Alternative B and C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of "Right-of-Way Exclusion Areas".
Under Alternative B and C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of "Right-of-Way Exclusion Areas".

Table B-1
Alternatives

Alternative Concept 3.1 Locatable Minerals We support an alternative that best allows for the following: • subsistence capabilities not be hindered • overall watershed impacts be minimized • stringent permitting for any BLM-managed land opened to mineral entry, especially adjacent to existing conservation units • connectivity between conservation units be maintained • when adjacent to conservation areas, the Dalton Highway corridor remain closed to mineral entry.
Exceptional view sheds along the Dalton Highway should be protected with rigid mineral and transportation permitting.
Under Alternative B and C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of "Right-of-Way Exclusion Areas".
The plan should also emphasize that mineral development under today's regulations can be performed in an environmentally safe manner as our operations have proven for the past 27 years.
The Chandalar mining district encompasses much of the area of the southern Brooks Range within the planning boundary.
We encourage BLM to retain alternatives in the draft plan that allow access and development of these resources.
We recommend that the BLM retain all closures (withdrawals) to mineral entry/oil and gas exploration and development/gravel extraction north of the South Fork of the Koyukuk River (or, better yet, Kanuti River, see below) and west of the Dalton Highway.
The Nigu River is an area of concern. It is rich in archaeological and cultural resources and a migratory path for Western Arctic Herd caribou. Residents of Anaktuvuk Pass have traditional ties to this area. It is good to see this area proposed for withdrawal from locatable mineral entry in all alternatives.
We support the recommendation to withdraw mineral licks. These are critical resources for wildlife populations in the area, particularly sheep.
The U.S. Fish and Wildlife Service (FWS) applauds the BLM for the primary objective which seeks to maintain water quality and quantity flowing onto Kanuti NWR from BLM-managed lands: "Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU." (p3) We likewise support the objective to allow ample lead time for BLM to analyze and perform careful permitting of locatable mineral activities: "Require and provide guidance regarding plans and notices that have sufficient quality and detail to process in a timely manner." (p3)

Table B-1
Alternatives

We believe that our success in managing the Kanuti National Wildlife Refuge (NWR) habitats to be productive for fisheries and wildlife depends upon the BLM providing the utmost consideration of upstream watershed impacts in the RMP. Withdrawal from mineral entry or in the absence of such withdrawals, extremely stringent permitting, would be required to maintain the currently healthy and productive watersheds that provide contaminant-free biomass production that supports current levels of subsistence and recreational harvests of fish and wildlife every year. We believe that BLM must avoid impacts to water quality and quantity upstream of Kanuti NWR so that habitat productivity and subsistence capability are not reduced. However, without some amount of mineral withdrawals, or highly stringent permitting immediately adjacent to and upstream from Kanuti NWR, it is difficult to see how the first objective would be fully met.
While the draft maps of recommended mineral withdrawals for Alternatives B and C are fairly clear, in many areas there is intersection and overlap with four other important features: lands with wilderness characteristics, high-value watersheds, connectivity areas, and 100-year floodplains (p4, bottom, p5, bottom). For these features, it is difficult for the reader to visualize which lands are involved and related to which box in the alternatives matrix. A carefully color-coded map of these latter four features would be helpful when considering the location and effects of potential mineral withdrawals. Also, there has been some early indication that in the Dalton Highway Corridor almost no lands would be considered for withdrawal from mineral entry, and no lands would be managed for wilderness characteristics in Alternative C. This is a preliminary decision that we do not totally agree with (see below), but nevertheless, these are features and decisions that should be clearly mapped.
We recommend that thresholds of water quality and quantity be established or defined as part of any mining or transportation activity to be considered for permitting. We recommend that the range of alternatives in the Environmental Impact Statement (EIS) include in the types, levels and intensity of monitoring efforts.
We recommend that BLM define what levels of water quality and quantity thresholds would trigger reduction in these additive cumulative impacts. To this end, the draft EIS should contain an Appendix that includes specific mineral permitting and monitoring guidance in the form of Standard Operating Procedures and Policies and/or Instructional Memoranda. These appendices should define the stringent permitting and monitoring that, in the absence of total mineral withdrawal buffers, would be the only appropriate management actions for areas upstream of a conservation system unit (CSU).
If BLM chooses no mineral withdrawals and/or does not implement stringent permitting with adequate compliance monitoring, Kanuti NWR would find it impossible to fully meet its establishment purposes under the Alaska Native Interest Lands Conservation Act (ANILCA). These purposes include: (1) maintaining fish, wildlife, and habitats in their natural diversity; (2) fit/flit international treaty obligations; (3) provide subsistence opportunity; and (4) maintain water quality and quantity. We respectfully ask that BLM honor Kanuti Refuge's legal establishment purposes and continue to cooperate with FWS so that the management of BLM watersheds that feed the refuge will allow us to meet our purposes long into the future.
BLM efforts to maintain connectivity corridors should include consolidation of federal ownership, right-of-way exclusion areas, careful design of wildlife crossings and fish passages, locatable mineral entry withdrawals, and/or stringent permitting.

Table B-1
Alternatives

In the overview paragraph for locatable minerals (p4) we would like to see more clarity as to which "Lands with Wilderness Characteristics" (LWC) would be recommended to be actually managed as "wilderness" under Alternatives B and C. Within the concept area of LWCs, we believe the BLM should also include and implement goals and objectives for habitat connectivity, as mentioned above. There should be a goal/objective stating that areas managed to maintain LWC would also be managed for habitat connectivity. We suggest BLM include strong recognition that any area managed for the connectivity goal would also concurrently enhance a fisheries and wildlife productivity goal which would enable BLM to meet subsistence harvest demands on their lands. Furthermore, such a goal would also allow FWS to meet their goals for fisheries, wildlife productivity, and subsistence on connected refuge lands. BLM's recognition of LWC and connectivity goals should support BLM efforts to allow for resilience in the face of future climate change or other stressor-driven trends.
Our three main points above would seem to justify that BLM carefully manage the entire Kanuti River and Kilolitna River watersheds upstream from the Kanuti NWR boundary. Withdrawal of lands from mineral entry would be our first preference for protection of these two important habitat areas upstream from Kanuti NWR. if expansion of these two ACECs is deemed not politically feasible, then we recommend designation of two special watershed management areas to be given priority attention any time that permitting decisions are made. For example, instead of stating in a general way that BLM will apply "best management practices" to mineral permitting actions, we would urge the BLM to allow only "state-of-the-art closed systems that discharge zero effluent into watersheds in all areas upstream of CSUs." This has been successfully demonstrated by the award-winning Nyac Mining Co. at Squaw Creek in the Chandalar River drainage, and elsewhere in Alaska.
Stated objectives include: Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU. Selawik National Wildlife Refuge is particularly concerned with water quality and quantity of streams that are within the same watershed as refuge lands. These include streams on the south side of the upper Selawik River which drain into the Selawik River, including Shiniliaok Creek, Shinilikrok Creek, Shovel Creek, Ingruksukruk Creek, and other unnamed creeks in between. These also include any areas within the headwaters of the Kobuk River, including portions of the Pab River and Pah River flats. ANILCA named preservation of water quantity and quality among the purposes for the creation of Selawik Refuge, and cooperation with upstream landowners such as BLM is essential to our ability to fulfill this purpose. We recommend that BLM include the above-named waters within protected classifications in the plan that will allow for achievement of the ANILCA water quantity and quality objective as it pertains to Selawik NWR.
Among the proposed alternatives, only Alternative B excludes the lands and waters in question from mineral development. We strongly recommend protecting BLM areas that impact Selawik National Wildlife Refuge, a downstream CSU, from mining development to ensure our ability to meet the requirements of ANILCA and other laws.

Table B-1
Alternatives

The conceptual alternatives presented at the Fairbanks public meeting appear to suggest BLM assigned increasing degrees of allocation across conceptual action alternatives without regard for establishing and maintaining landscape-scale priority conservation areas. For example the action alternatives for Land and Realty — Withdrawals, Public Land Order (PLO) 5150 — recommend in Alternative B — that most of the PLO (inner and outer) be retained, while alternative C lifts the PLO of the inner corridor along almost its entire length, and alternative D, the entire PLO (inner and outer) is lifted. A similar allocation thought process was employed for locatable mineral entry alternatives. We believe that mineral withdrawals and retention of the PLO 5150 withdrawal need to be at least partially carried into Alternatives C and D in order to achieve holistic landscape planning.
As your conceptual alternatives read now for this resource use, it is very difficult to discern the differing allocation patterns across action alternatives when acreage values are combined (e.g., withdrawn and acres recommended for withdrawal from locatable mineral entry are shown only as one value). In your action alternatives we suggest you use something similar to that below so the reader can differentiate between: a) Acres open to locatable mineral entry b) Acres closed to locatable mineral entry c) Acres recommended to be closed/withdrawn from mineral locatable entry (must be petitioned for withdrawal); however this is not a viable recommendation for areas greater than 5,000 acres.
We are extremely pleased with the goal: "Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU." ('p.3) We would like Nowitna NWR also to be named in that goal.
Withdrawal from mineral entry and/or establishment of strong watershed protection measures are essential for Nowitna NWR to achieve its legal mandates as established by ANILCA (maintain diversity of fish, wildlife and habitats; maintain water quality and quantity; provide for subsistence opportunity; and, fulfill international conservation treaty obligations). In the absence of mineral withdrawals, the RMP should specify which strategies would be used by BLM to maintain water quality and quantity in the event that mineral or transportation permitting may occur.
Alternative Concept 3.1 — Locatable Minerals We are extremely pleased with the goal: "Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILC'A) and the purposes of the CSU" (p3). We would like Innoko/Kaiyuh Flats NWR also to be named in that goal.
Withdrawal from mineral entry and/or establishment of strong watershed protection measures are essential for Innoko/Kaiyuh Flats NWR to achieve its legal mandates as established by ANILCA (maintain diversity of fish, wildlife and habitats; maintain water quality and quantity; provide for subsistence opportunity; and, fulfil international conservation treaty obligations). In the absence of mineral withdrawals, the RMP should specify which strategies would be used by BLM to maintain water quality and quantity in the event that mineral or transportation permitting may occur.

Table B-1
Alternatives

Alternatives – Lands and Realty
Alternative A
Concern that there does not appear to be an alternative that contains current management for PLO 5150. The public is being painted into alternatives that get rid of 5150 but these all show BLM getting rid of some component.
Are the current withdrawals that were approved but not finalized (old plans), managed as though they are withdrawals until they are actually withdrawn?
Withdrawals proposed (but not finalized under old plans) should be shown on a map.
Would like to see PLO 5150 maintained so as to provide connectivity between Kanuti and Yukon Flats NWRs.
It is important to keep PLO 5150 in place and unmodified to protect the fragile habitats and vulnerable resources in the planning area by not transferring these lands to the state.
Dalton Utility Corridor (PLO 5150) 3.2 Line 2. Only Preliminary Alternative A is the only presented Alternative, that is legal and statutorily viable. Retention of the PLO 5150 lands is clear in ANILCA statute regarding the Utility Corridor, found Section 906 and Section 1322.
Right--of--way exclusion areas. For this line Alternative A would address the critical habitat issues with the ACECs found in Alternative B. Add ACEC list to Alternative A without excluding access.
Line #2: The Service recommends providing the total acreage already developed or permitted for rights-of-way and other development in the corridor. The acreage already developed or permitted will be helpful when comparing alternatives, and help facilitate a better understanding of the current status of developed areas in the CYRMP. The Service believes the acreage is small; an actual value can provide perspective to the proposed alternative acreages slated for withdrawal or open status.
The inner corridor is differentiated in Alternative A. Please include a description for the inner and outer corridors; a map depicting the sections would be helpful. Please consider providing inner corridor information for the remaining alternatives along with a map of the areas where withdrawal of lands for State and ANSCA selections, or other disposal, is proposed.
Alternative B
Locatable Minerals: All of the specific river drainages, mountain ranges, mountains and valleys in B are good choices and should be retained.
…the entire upper Kanuti River drainage. For reasons stated above, this drainage should be included in its entirety for withdrawal from mineral entry.
I am in agreement with most of your planned land order withdrawals, especially those in the Dalton Corridor, being left intact, with three important exceptions, which are areas adjacent to conservation system units, such as, the entirety of BLM land along the borders of the two National Wildlife Refuges and the Gates of the Arctic National Park. These should be withdrawn from any form of human developments or modification. And this withdrawal should especially include the portion of the Kanuti River drainage abutting the Dalton Highway on both sides.

Table B-1
Alternatives

I support all ACEC's to be withdrawn from mineral entry under Alternative B. These are all special areas and mining activity could hurt the values for which they are identified. All areas managed for wilderness characteristics as in Alternative B should be withdrawn from mineral entry. High value watershed should be protected as defined in Alternative B. All mineral licks & hot springs should be protected as defined in Alternative B.
In proposed Alternative B, the ROW exclusion areas are so extensive that they essentially prevent creation of any continuous access across or within the planning area. Examination of BLM's Preliminary Concept Alternative maps for Recreation that partially depict proposed exclusion areas, in combination with high priority watersheds on the Wildlife Habitat and Priority Watershed Maps for Alternative B, reveal a virtual, defacto prohibition of any meaningful East-West surface transportation route across most BLM lands in the planning area.
Alternative B is not a reasonable alternative for BLM to even consider advancing to the public as it so blatantly violates FLPMA and ANILCA requirements to provide reasonable access across BLM lands.
AMA opposes, and BLM should not go forward with Alternative B, as it completely fails to meet BLM's multiple use mandate as required by the Federal Land Policy and Management Act (FLPMA). Under Alternative B very little land with resource development potential is available for exploration and possible development, and public access opportunities are greatly curtailed, particularly through the introduction of large areas where any developed access is prohibited by "Right of Way Exclusion Areas."
The PAC applies a ROW exclusion area to "suitable river segments classified as Wild per the Wild and Scenic Rivers Act" (page 9, alternative B), which is inconsistent with the ANILCA Title XI transportation and utility system process that allows for ROWs across CSUs, including Wild and Scenic Rivers.
PLO 5150 Alt B or C-Dall River is headwaters into Yukon Flats NWR and Steven's Village. Concerns about changes in water quality impacts. Dall river has hot springs, native allotments. The Dall river traditionally fed the tribe. Waterfowl hunting (canvas backs, pintail, mallard, geese), resident pike population (historically but over fished in the past few years, with the opening of the Haul Road). Important waterway to access resources.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.
Alternative C
What's up with C, BLM can already permit pipeline so what is the value for the state of Alaska to have those lands? If the justification for lifting a PLO is that the reason it was no longer needed, how can BLM recommend lifting a portion of 5150 when the state wants it for the same reason it was set aside. It seems it is still needed.
We believe Alternative C should identify specific withdrawals to locatable mineral entry for highest value watersheds and 100-year floodplain areas.

Table B-1
Alternatives

Also in Alternative C, the Refuge Association and Friends urges BLM to propose a buffer of locatable mineral withdrawals to insulate the boundaries of all CSUs.
PLO 5150 Alt B or C-Dall River is headwaters into Yukon Flats NWR and Steven's Village. Concerns about changes in water quality impacts. Dall river has hot springs, native allotments. The Dall river traditionally fed the tribe. Waterfowl hunting (canvas backs, pintail, mallard, geese), resident pike population (historically but over fished in the past few years, with the opening of the Haul Road). Important waterway to access resources.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.
Alternative D
In alternative D, BLM plans to lift the entire PLO, how will BLM be able to meet the requirements for ANILCA section 811 (a) subsistence access under this alternative?
In its 2006 report to Congress in response to Section 207 of ALTAA, BLM concluded that most ANCSA Section (d)(1) withdrawals should be revoked, but left it to future planning efforts such as the current Central Yukon RMP to make final decisions regarding revocations. Alternative D is the alternative most consistent with BLM's conclusions in the 2006 report to Congress.
We urge Alternative D include a minimal amount of PL5150 retention areas as buffers along the CSU boundaries within the Dalton Highway outer corridor.
New Alternative
The road to Ambler which the miners support and would like to see the same thing up the South Fork Koyukuk and Bettles river.
Why doesn't BLM just draw a line down the Dalton Corridor, on the west side keep undeveloped and just concentrate all the development on the east side?
Need for additional Alternative without lifting 5150, providing more mineral entry than Alt B.
I would like to see 2 aspects included in the alternatives. In terms of the alternatives is it possible for a mechanism that allows for access to private property owner's access to private property (for motorized access) either in the inner or outer corridor that would give private property owners the same level of access as those with mineral claims. (Discussion/explanation from BLM that solicitor would likely find this inconsistent with ANILCA. Additional clarification of ANILCA provision for subsistence access). Those with mining claims have different means to access their claims than those private property owners have for accessing private property. I would like to see these explored in the alternatives.
Needs to be an alternative that does not open PLO 5150, retains.

Table B-1
Alternatives

Mineral withdrawals being proposed are disingenuous because congress must approve any withdrawals over 5,000 acres which is not likely to happen. Suggest that another alternative may use other management prescriptions to achieve the purposes for which the withdrawals are being proposed. For example, could the withdrawals be replaced with a prescription to manage the lands for wilderness character?
Referring to the area shown in the Venetie block (shown in blue as various PLOs incl. 5179) – why not maintain the PLOs which close the area to mining (Alt A) instead of proposing a mineral withdrawal (Alts B and C).
There are no areas that I think BLM should dispose of.
I would like no infrastructure outside the pipeline corridor.
Additional infrastructure should be placed alongside the pipeline, ideally buried from view and to reduce wildlife impacts.
The planning area holds some of the last remaining such lands and its imperative they be protected as wilderness or as a backcountry management area.
We'd like to see an alternative that concentrates areas of human disturbance into "development nodes" with provisions to protect just about everything else. We recommend that you include all watersheds, and not just select sensitive watersheds.
Doyon urges BLM to take a similar approach to this particular issue here, recognizing that BLM can evaluate and address the potential environmental impacts of any proposed ROW as part of its review of applications under the agency's normal permitting process.
We also strongly support the revocation of all the outdated ANCSA land withdrawals since they have long outlived their purpose and need.
We therefore request that the CYRMP's range of alternatives include at least one alternative that recommends lifting all PLOs in the planning area that have outlived their intended purpose, including PLO 5150.
We recommend that BLM provide special treatment to lands that are immediately adjacent to CSUs. For example, we recommend that the Public Land Order (PLO) 5150 and/or 17 (d) (1) withdrawals remain in place, at a minimum, in locations and in a pattern that would form a strip of at least one township wide along refuge boundaries to provide a conservation buffer. This is similar to urban planners providing for a gradient in land use intensity (e.g. from industrial to residential) rather than allowing for sudden changes in land use. In this case the transition from conservation to intensive extractive development should be gradual across the landscape. These buffers should remain in the federal estate. If withdrawals specifically are not feasible to implement, we recommend using other avenues that would achieve the purposes of withdrawals.

Table B-1
Alternatives

Through the designation of appropriate-sized buffers (e.g., at least one-township-wide, or one HUC 12 unit-long) the BLM can accommodate appropriate and needed development within the "inner corridor" and keep the impacts a reasonable distance from CSU boundaries so that downstream water quality and quantity impacts will be minimized. Similarly, it is the FWS position that alternative D should include retention of the PLO 5150 withdrawal in areas that would form buffers along the CSU boundaries within the Dalton Highway "outer corridor." This recommendation is analogous to land-use zoning at the city, borough, or county scale in the U.S. In similar multi-use context, planners may allow heavy industrial use in one area, mixed use or light industrial adjacent to that, and quiet residential use adjacent to that. In order to avoid land-use conflicts urban planners usually do not intentionally place heavy industrial use immediately adjacent to quiet residential use. We believe that a graduated intensity of development moving away from the CSUs is needed. Furthermore, this zonation should recognize that the connectivity or benchmark areas (see below) should have development avoidance strategies. That would translate into no lifting of PLO 5150 in those areas. In Alternatives C and D, it is difficult to see how BLM could achieve the goals/objectives listed above (p3, p7, p8) if land disposals would be allowed adjacent to a CSU, including Kanuti NWR.
Somewhere in the "Land and Realty" concept, or below in Concept 3.3 "Lands with Wilderness Characteristics," the BLM should discuss and plan for habitat connectivity. Maintaining habitat connectivity is one of the most important actions managers can take to provide for resilience in the face of climate change, a finding based on an extensive analysis of research and biodiversity planning recommendations made during the past two decades (Heller and Zavaleta 2009). By working together, the BLM, FWS, and the Northwest Boreal Landscape Conservation Cooperative (NWB LCC) have determined that there are BLM lands that deserve special attention because they connect existing CSUs (Magness and Robertson 2016). A relatively small connection spanning BLM lands in between CSUs could be one of the most important and cost-effective ways we can allow for climate adaptability as habitat changes may force species' movements across the landscape. It also fills BLM's planning mandate to plan and manage at landscape scales. Thinking proactively about connectivity while our landscape is still largely intact not only could save billions in future costs, but with minimal land designation or special management can maintain the iconic Alaskan landscape for centuries.
Furthermore, we recommend that BLM replace the current 17-d-1 withdrawals (purpose of protecting land until selection finalized) with a withdrawal which would retain the mineral closure without triggering the 5,000 acre threshold for congressional approval. If this isn't possible then we suggest other avenues to achieve the purposes of the withdrawals such as: (a) designating a series of watershed protection zones (especially if the ACECs do not provide adequate coverage); (b) managing the lands for wilderness characteristics; or, (c) highly stringent permitting.
We recommend retaining the PLO which withdrew the Venetie Block from locatable mineral entry to include all lands east of the Dalton Highway, from the Yukon River Bridge to mile marker 170 and those BLM-administered lands located adjacent to the Yukon Flats northern refuge boundary and east to Venetie to protect headland waters flowing into the Yukon Flats NWR and to protect subsistence resources and traditional and cultural lands of Stevens Village and Venetie residents. This includes an important fall chum spawning area that is critically important to subsistence.
Opening new lands to mining by lifting withdrawals Until a better record of mine reclamation can be demonstrated, we recommend no additional lands be opened for location and entry. As it stands 60% of the planning area is already open to mining. Again, we strongly urge BLM to fully utilize the BEACONS modeling approach as a method for determining which, if any, areas are appropriate to being open to locatable mineral entry.

Table B-1
Alternatives

Line #3: Buffers play an important role in maintaining environmental quality of the CSUs, by providing connecting corridors and reducing fragmentation. We suggest corridor lands adjacent to CSUs remain closed to state selection to maintain buffers while promoting connectivity among all CSUs. See the recommendations for maintaining connectivity among CSUs as presented in the comments from Kanuti NWR and Yukon Flats NWR. Connectivity analyses specifically modeled for the BLM CY planning region have been developed and are currently available.
We would also recommend establishment of a 1-township-wide buffer around the borders of Koyukuk NWR. In such a manner, future permitting of multiple-use functions, such as mining, transportation, or other development, could be spatially separated from the conservation purposes of Koyukuk NWR. One strategy may be to retain the 17 (d) (1) withdrawals that encircle some refuge boundaries
Alternative concept 3.2 — Lands and Realty We would like the BLM to consider it critically important to retain in federal ownership those lands that support high-value watersheds that flow into Nowitna NWR (as named above: Lost River, Our Creek, Sulukna River, Telsitna, River, and Titna River, Flint Creek). We would also recommend establishment of a 1-township-wide buffer around the borders of Nowitna NWR. In such a manner, future permitting of multiple-use functions, such as mining, transportation, or other development, could be spatially separated from the conservation purposes of Nowitna NWR. One strategy may be to retain the 17 (d) (1) withdrawals that encircle some refuge boundaries.
We would like the BLM to consider it critically important to retain in federal ownership those lands that support high-value watersheds that flow into Innoko/Kaiyuh Flats NWR (as named above: Eddie Creek, Bonanza Creek, Camp Creek). We would also recommend establishment of a 1-township-wide buffer around the borders of Innoko/Kaiyuh Flats NWR. In such a manner, future permitting of multiple-use functions, such as mining, transportation, or other development, could be spatially separated from the conservation purposes of Innoko NWR. One strategy may be to retain the 17 (d) (1) withdrawals that encircle some refuge boundaries.
Combination of Alternatives
Start by lifting the PLO 5150 or whatever and turn the lands in the entire inner corridor to the State.
If PLO has fulfilled its original purpose (space for location or the TAPS P/L) then it served to continuing purpose.
If there is no threat at this time, why would BLM take land off the table for development?
Up to Bettles and all the tributaries, up to Alatna and Old Man River are the traditional use areas. We used to pick berries in up and down these areas. Since the pipeline, we don't see caribou anymore. The kids used to scrape the skin of the caribou to make leggings and moccasins. They don't do that anymore and don't know how because there is nothing to teach them, there is no caribou. And now the moose is going. That is our food. It reminds me of listening to outside Indians when the white people were moving west and killing the buffalo. We don't want this Ambler Road. We want our fishing, hunting, trapping and berry picking. Our elders were smart enough to not accept reservations and smart enough to say no to a dam, we have to follow them and say no to the road.
We will be nothing if you open our land. If the state gets the land, everyone comes in. It is a bad influence on our land and our people.

Table B-1
Alternatives

Wouldn't it make more sense to either extend the distance from a waterway before allowing development of a right-of-way or negate it all together? As this state has less flowing waters & the state can develop below the mean water line, it may make more sense to do one of the above to avoid creating isolated islands of development.
Withdraws from the planning area should be reviewed. Decisions to modify should be given serious consideration (with an emphasis on "least restrictive").
I oppose the PLO 5150 lands turned over to the State of Alaska, for the reason that ANILCA Provisions would not be afforded under State ownership, for subsistence access.
Alt B, C and D are a nightmare for subsistence. In Alt C, one mile distance for subsistence makes a checkerboard and cuts off access. If only leave mile open for subsistence then on either side, there would be hunting pressure. Would the state leave in the restriction for motorized use if this becomes state land?
We have development all over the world, we don't have much pristine wilderness. Why would BLM give it away?
Is there any land that BLM really wants? Would BLM get land in return from the State of Alaska?
Assumption with the little corridors is that there is some way of getting out; there is no…way to make this work. Most hunting happens within the corridor so this does not work.
Discussion about state statute (Dalton Hwy statute 200) that discusses the restriction of state disposing of land within 5 miles of the highway right of way, state can't dispose of land except for public utilities and doing leases in the nodes only for non-residential purposes.
Discussion about development nodes and where those should be.
Brief discussion about route identified for Ambler Road utility corridor. Concerns about non-public route. When there was a closure of the Dalton highway to the public, there were hunters along the road disguised as miners with hunting interests through paper staking of mining claims.
I, as well as the whole community that was present at the meeting am adamantly opposed to any further modification of the current PLO 5150 to allow State selection of Federal Public Lands in the existing Utility Corridor. My reasons are: the legality, the detriment to the communities here, and it is not in the best interest of the people of America.
Opening PLO 5150 and conveying more lands to the State of Alaska would be in violation of the "Federal land Policy and Management Act" of 1976.
I photo scanned the 906 (j) reference to 5150. ", such lands shall remain unavailable for future State selection except as provided in (e) of this act;" When looking at the (e) provisions there is still no mandate to lift and convey the PO 5150 lands to the State. If the Congress wanted them conveyed they would have required it. FLPMA is clear about not giving away the farm for a handful of beans also. Secretary Zinke has the final word.
All federal lands within the Pipeline Corridor should be retained by the federal government.
PLO 5150 should not be lifted except for two small parcels, one near the Bettles Winter Road access & one near Chandalar Shelf.

Table B-1
Alternatives

Only one small parcel of land, containing several hundred acres near the junction of the Bettles Winter Road should be opened up for State Land selection. All remaining lands in this section of the corridor proposed for removal from PLO 5150 under Alternative B should be retained under PLO 5150.
The State of Alaska already owns significant portions of the upper South Fork. The federal government needs to maintain all the lands within this corridor as a buffer to the Kanuti Refuge. If these lands were opened to mineral leasing placer mines would proliferate in the area, seriously reducing water quality & affecting salmon runs farther down river.
North of the South Fork of the Koyukuk the highway enters the Middle Fork of the Koyukuk Valley. From here on up the haul road enters its most scenic section. There are sufficient state lands in the Coldfoot area already to meet the needs of the public for developed facilities & potential state land disposals. All remaining land within this section of the corridor needs to be retained in federal ownership as a buffer zone to the Gates of the Arctic National Park.
The Dietrich Valley, Bettles River, Sukakpak Mountain, all the way to Chandalar Shelf is National Park caliber lands. None of this should be opened to potential state land selection or mineral leasing. This entire area should be considered a buffer zone for the national park. It should all remain under federal control & be managed for its recreational potential.
All but a very small section of land in the Chandalar Shelf area should remain under PLO 5150. BLM could open up no more than several hundred acres in the Chandalar Shelf area for State Highway Maintenance Facilities. The 10-mile stretch proposed for opening in Alternative B should be reduced to a much smaller section of no more than a mile in length.
East of the Dietrich River the block of land in state priority level 3, 13 & 14 should also be retained by BLM & not opened to mineral leasing. People hike back into these mountains from the haul road. This buffer to the east is important access to the rugged mountains west of the headwaters of the North Fork of the Chandalar River.
The only portions of the entire corridor that should be released from PLO 5150 are a small plot of several hundred acres near the Bettles access road junction & another small section of no more than a square mile in the Chandalar Shelf area for road maintenance facilities.
All BLM lands adjacent to the Kanuti NWR should be retained in federal ownership as buffer zones around these critical wildlife refuges.
All BLM lands adjacent to the Koyukuk should be retained in federal ownership as buffer zones around these critical wildlife refuges.
All BLM lands north of the Koyukuk NWR & adjacent to the upper Selawik River should be protected as a buffer zone for these national wildlife refuges.
All BLM lands south and east of the Nowitna NWR should be retained to protect the values for which this refuge was set aside.
All BLM lands east & north of the Yukon Flats NWR should be retained to protect the values for which this refuge was set aside.

Table B-1
Alternatives

Public access out of the corridor including by snowmobile should be allowed from Galbraith Lake west. The Ambler Road Corridor by Chapman Creek should not be authorized & be vacated from all alternatives. If this road ever goes through, it should go through Bettles & consolidate all utilities along this route that will be more useful to the local people. This road should only be approved if the people living along the route agree to its construction.
The Umiat Road corridor should be vacated.
There should be no lifting of PLO 5150 within the Pipeline Corridor except the two locations mentioned earlier (small parcel at Bettles Road junction & Chandalar Shelf).
Need to clarify which lands were approved for withdrawal under the old plans and why. Overlay the old withdrawals with new proposed withdrawals.
PLO 5150 Maps – Alt D lifts too much of PLO 5150; believe some of the PLO should remain in place to provide for connectivity between CSUs (e.g., Mile 70 to Mile 150 and Mile 245 to Mile 270 of Dalton Highway). Also, Alt C not balanced – should retain more lands under PLO 5150 to provide for breaks between what would become State managed lands.
PLO 5150 Maps – maps don't show existing ACECs; hard to tell where the proposed lifting of the PLO 5150 would conflict with existing ACECs. Should not lift PLO where existing ACECs already established; Also, this same comment for proposed ACECs.
Important to show PLO 5150 relative to other management designations (e.g., RNAs, ACECs) that may not be compatible with lifting the order.
If BLM doesn't own the land in 5150, this area is now open to everyone not just subsistence users and then anyone can mine in there. If BLM maintains the land, then BLM is under the scrutiny of/responsible for the cause and effects of what happens to the land.
Ruby tribe would like to know more about the conveyance of BLM Lands in the Ruby vicinity to the State of Alaska.
The lift on the utility corridor has no efficacy. The current environment does not favor the development of a natural gas pipeline. The State of Alaska lacks adequate funding to undertake such a project. Natural gas is so available around the world that world markets do not need to look to us for that resource so the return on that investment just is not there.
We do not want to see any kind of infrastructure development in this area.
We recommend that Alternatives B and C preclude state selections in this area.
All ROWs should be minimalistic to reduce trail proliferation and visual impact, and they should be concealed well enough that activities are not easily noted by highway travelers. This plan should include a noise buffer as well as a visual buffer.
We would like to see BLM increase the amount of acreage that is withdrawn from mineral entry, and we prefer the PLO 5150 corridor remain closed to new mineral entry.
ABHA strongly opposes the lifting of PLO 5150, and other withdrawals that would result in large transfers of federal land to the state of Alaska or ANSCA Native Corporations, because the desired future state of these lands is for backcountry appeal, ecosystem health and connectivity of public lands. Lifting PLO 5150 will remove protections that have guided land use policy and hunting regulation for two decades, quite effectively.

Table B-1
Alternatives

Before transferring any acreage from public trust, that baseline approach would establish a more responsible Lands Transfer Program policy addressing true critical areas of concern regarding the impacts of any development of this region.
If and to the extent, however, that BLM proposes to identify any ROW exclusion or avoidance areas, it is critically important that BLM first fully consult with potentially affected Alaska Native Corporations and tribal entities, and seek input from local communities, on the specific location and extent of such areas to determine and avoid or minimize potential adverse impacts on access and use.
Doyon is continuing to work to identify lands that will need access to and from the Utility Corridor, and looks forward to a meaningful dialogue regarding corridors and other access through formal consultation with BLM before these alternatives are proposed for public review and comment in a draft EIS, and as BLM continues to work to finalize the RMP.
Doyon is continuing to work to identify areas that might benefit from such corridors to facilitate access, and looks forward to a meaningful dialogue regarding corridors and other access through formal consultation with BLM before these alternatives are proposed for public review and comment in a draft EIS, and as BLM continues to work to finalize the RMP.
This category should address access for mineral extraction with heavy machinery during winter only. Building all season roads to every many different mining operations is not necessary or compatible with other resource interests.
There are statutory as well as other compulsory reasons to recommend in the preferred Alternative not to lift any portion of the PLO 5150, and to not convey any Top Filed lands to the State of Alaska.
Under Alternative B and C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of “Right-of-Way Exclusion Areas”.
Under Alternative Band C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of "Right-of-Way Exclusion Areas".
AMA supports the statement in the overview for the Lands and Realty Section that under alternatives B, C, and D BLM will recognize the Ambler and Umiat road corridors. This provision should be included in ALL alternatives.
The proposed ROW exclusion areas, that would place large areas of BLM land off limits to any future ROWs, are premature. They are NOT consistent with the intent of Congress expressed in Title XI of the Alaska National Interest Lands Conservation Act (ANILCA), where Congress acknowledged that transportation and utility systems would need to be built across federal lands in Alaska.
Of particular concern are the ROW exclusion areas in the Sethkokna River, Sulukna River and Ray Mountains/Tozitna River ACECs. This alternative may actually force any future surface transportation route to be routed through already established Federal Conservation System Units (such as the Kanuti, Nowitna, or Koyukuk National Wildlife Refuges), rather than across “multiple use” BLM lands.

Table B-1
Alternatives

AMA found it difficult to identify what lands were included in several of the proposed ROW exclusion areas under both Alternatives B and C due to inconsistencies in terminology and the illegibility of the maps. Boundaries of these proposed exclusion areas need to be clarified in any future documents. For example: • we could not find where the "Wild" segments mentioned under Alternative B on page 9 are depicted; • the depiction of ROW exclusion areas on the Recreation maps are hard to read due to the use of similar line patterns with other categories shown on the map and legend; • BLM uses inconsistent terminology, as the maps indicate "High Priority Watersheds" while the table on page 9 refers to "High Value Watersheds"; • The Ray Mountains/Tozitna River appears to be a ROW exclusion area on the map but is not listed on page 9 under Alternative B.
We oppose lifting PLO 5150 and believe that ownership and management of the Dalton Highway corridor should remain the same. Changes to this PLO and the administration of these lands would greatly complicate subsistence resource management and would likely increase the competition for subsistence resources within the region, particularly between rural residents and visiting hunters. Additionally, numerous existing ACECs and RNAs exist within this 2.1 million acre corridor.
Under Alternative B and C very little land with resource development potential is available for exploration and possible development, and severe limitations are placed on public access opportunities, especially with the introduction of "Right-of-Way Exclusion Areas".
To support Kanuti National Wildlife Refuge's ANILCA purposes, we urge that the most valuable fisheries and subsistence areas on the BLM portions be withdrawn from mineral entry to minimize downstream impacts. Even Alternative D should have some mineral withdrawals in the most critical watersheds.
The Refuge Association and Friends believe successful management of the seven listed refuges for fisheries, waterfowl/waterbirds and mammals requires BLM to consider upstream watershed and wildlife crossing corridor impacts. We urge BLM to consider site-specific withdrawal of certain areas from mineral entry.
The Refuge Association and Friends support the goal/objective and relative amounts of lands to be retained in federal ownership by the PLO 5150 withdrawal.
We support intensive management near designated "development nodes" of the inner corridor to allow infrastructure along the Dalton Highway at specific sites.
We urge BLM not to lift PLO 5150 withdrawals adjacent to Arctic, Yukon Flats, and Kanuti National Wildlife Refuges, which serve as critical buffers between the refuges and the Trans-Alaska Pipeline System (TAPS) and Dalton Highway.
We believe BLM can use strategic buffers to accommodate responsible corridor development while avoiding adverse impacts to refuge boundaries, e.g., noise, viewshed impairments and downstream water quality/quantity.

Table B-1
Alternatives

The Refuge Association and Friends strongly support the Alternative A ("No Action") withdrawal for mineral entry of five townships outside Kanuti National Wildlife Refuge (p.6). As this withdrawal has existed for 30 years, we see its economic impact as insignificant. Yet removing the withdrawal without creating buffers would have adverse environmental impacts to Kanuti National Wildlife Refuge through reduced water quality and quantity and negative impacts on fisheries and subsistence. We urge this withdrawal be included in Alternative B and C as well.
In the "Land and Realty" concept we suggest BLM address habitat connectivity as important to climate change. BLM, the U.S. Fish and Wildlife Service, and the Northwest Boreal Landscape Conservation Cooperative identified special-value BLM lands connecting current CSUs critical to species' adaptability to habitat changes. One such piece of land connects Arctic National Wildlife Refuge and Gates of the Arctic National Park/Preserve while another links Yukon Flats National Wildlife Refuge and Kanuti National Wildlife Refuge. We support similar connections identified by the Northwest Boreal LCC between Koyukuk Refuge, Kanuti National Wildlife Refuge, Innoko National Wildlife Refuge, Nowitna National Wildlife Refuge and Denali National Park/Preserve.
I recognize the State of Alaska's interest in ownership of the Dalton Highway Corridor, but feel that future development should be along a fairly narrow corridor.
Landscape Connectivity barely received honorable mention under wildlife management in the Scoping Report for the Central Yukon RMP, dated March 25, 2015. Somewhere through the planning process, this issue has been raised to be a major management concern that is now driving alternative development. Further, this concern appears at least in part to have resulted in the establishment and application of the Right of Way Exclusion areas applied throughout alternatives B and C.
In Summary, there is simply no justification given for the broad application of ROW exclusion areas in Alternative Band C. Use of these overly restrictive ROW Exclusion Areas should be dropped from consideration as future alternatives are developed.
We have two primary concerns regarding the proposed alternatives in the PAC as they relate to state selections and management of the utility corridor; 1) the PAC proposes retention of Public Land Order (PLO) 5150 in all but one of the alternatives, which would continue to preclude the State's valid top filing selections from attaching; and 2) alternatives B and C would result in fragmented ownership of the utility corridor.
In developing plan alternatives, BLM should consider the potential land ownership pattern following completion of State and Alaska Native land conveyances.
We are concerned that broad-scale designations and restrictions will diminish the importance of mitigating project-specific impacts across the planning area and request BLM re-consider the need for the proposed special designations and withdrawals identified in the PAC.
We request BLM avoid application of right-of-way (ROW) exclusion or avoidance areas in the CYRMP.
ROW exclusion and avoidance areas generally conflict with the overarching purpose of the utility corridor and should not be applied in the corridor under any of the alternatives.
In general, ROW exclusion or avoidance areas should not overlap RS2477s as these routes are and will likely continue to be needed for winter access. This applies to the Upper Kanuti, Jim River, Ray Mountains, South Fork Koyukuk, Upper Teedriinjik (Chandalar) River, Indian River, Galena Mountain Caribou, Mentanontli River/Lake Todatonten, South Todatonten Summit, and Alatna River ACECs.

Table B-1
Alternatives

In some cases, the ROW exclusion and avoidance areas are defined by areas that are difficult to envision or locate on the ground, such as the 100-year floodplain within some ACECs, known overwintering habitat, or known spawning areas. Excluding ROWs from 100-year floodplains without adequate descriptions or justification needlessly excludes public use and ignores existing authorities that would mitigate resource impacts associated with development projects.

It is important that access to and from airports are not affected by ROW exclusions areas, as well as ACECs, SRMAs, ERMAs. The following is a list of airports and M&O camps located along the Dalton corridor, which need to be recognized and identified throughout the draft plan and on all maps.

Airports

- Deadhorse
- Galbrath Lake
- Chandalar Lake
- Wiseman
- Coldfoot
- Prospect Creek
- Livengood Camp

M&O Camps

- Deadhorse
- Sag River
- Chandelar
- Coldfoot
- Jim River
- Seven Mile
- Livengood
- Manley Hot Springs

We reiterate our request to not apply ROW avoidance or exclusion areas to CSUs (either designated or recommended as suitable in the CYRMP) and to simply defer to the ANILCA Title XI process and the respective implementing regulations at 43 CFR 36.

Page 8, Lands and Realty Overview, second paragraph: The Umiat Road corridor is a potential future route. We suggest BLM add the following to the last sentence "…Toolik Lake RNA for potential future use."

Inclusion of the Ambler Mining District access road in development of alternatives gives the false impression that the full access road right-of-way (ROW) is a foregone conclusion, when in fact an EIS has not yet been prepared and a decision has not yet been made.

It is important to maintain BLM ownership of lands within the pipeline utility corridor. These lands have very high public value, particularly as wildlife (e.g., sheep) habitat and migratory paths (caribou), and are critical subsistence use areas local residents.

BLM should not transfer the corridor node properties because this is land that is used to access GAAR. Wiseman is a resident zone community of GAAR and community members continually utilize subsistence resources within the Park.

Table B-1
Alternatives

Moose migrate between GAAR and Kanuti NWR. Retaining closures and limiting development and ROWs north of the Kanuti River and west of the Dalton Highway would help maintain connectivity between these two federal conservation units (as well as limit development adjacent to Kanuti NWR).
Sheep move between eastern GAAR and the Dalton Highway, so retaining closures and limiting developing and ROWs all along this border to Galbraith is key for sheep in addition to moose.
Any proposed development should be clustered to reduce its spatial influence.
We strongly support the goal/objective: "Retain public lands with high resource values. Adjust land to consolidate public land holdings, acquire lands with high public resource values, and meet public and community needs" ('p7); and, "Consolidate land management that sustains natural resources necessary for meeting subsistence needs" (p 8).
In Alternatives B and C, we agree that the range of alternatives and the relative proportions of lands to be retained in federal ownership through not lifting the Public Land Order (PLO) 5150 withdrawal seem reasonable. Alternative C allows 157,400 acres of the PLO 5150 withdrawal to be lifted, which could make these lands eligible for transfer to the State of Alaska or Alaska Native Claims Settlement Act (ANSCA) Corporations that want to fulfill their lands entitlements. We agree that more intensive development is appropriate near designated "development nodes" of the "inner corridor" and that future public services and infrastructure along the Dalton should be accommodated at these development nodes. Conversely, we also believe that there are areas that must remain in the federal estate because they are immediately adjacent to federal Conservation System Units. The FWS strongly requests that BLM not lift any PLO 5150 withdrawals immediately adjacent to Kanuti NWR. These lands are of national interest and should remain in the federal estate to act largely as buffers between CSUs (like Kanuti NWR) and the increasingly intensive development that is occurring and is anticipated near the Trans-Alaska Pipeline System (TAPS) and Dalton Highway.
Figure 1, below, shows the most important parts of the planning area that provide connectivity between existing CSUs, based on an analysis of geophysical linkages and enduring features. Most important in the PLO 5150 discussion are two relatively small pieces, one between Arctic NWR and Gates of the Arctic National Park and Preserve (NPP), and another between Yukon Flats NWR and Kanuti NWR. These lands should remain in the federal estate in order to continue to provide connectivity between the CSUs. Also, connections between Koyukuk NWR, Kanuti NWR, Innoko NWR, Nowitna NWR and Denali National Park/Preserve have been identified by the NWB LCC as important to maintain and can be achieved through special management strategies.
BLM efforts to maintain connectivity corridors should include consolidation of federal ownership, right-of-way exclusion areas, careful design of wildlife crossings and fish passages, locatable mineral entry withdrawals, and/or stringent permitting.
BLM should prioritize connectivity corridors into two classes needing varying management attention: 1) connectivity within the Dalton Corridor, where frequent monitoring and permitting attention would be needed, and 2) areas outside of the corridor, where such monitoring may not be needed in the near-term. Figure 1 represents one possible set of potential connectivity corridors. Other important areas likely exist that could connect blocks of BLM and state lands.

Table B-1
Alternatives

The U.S. Fish and Wildlife Service, through the NWB LCC, contributed additional scientific analyses of the planning area by cooperating with the Boreal Ecosystems Analysis for Conservation Networks (BEACONS) project. This project sets up a landscape-scale adaptive management framework that allows BLM and other landowners managing for multiple uses to determine the impacts of various management actions. In a rapidly changing climate, we cannot look to historic baseline to serve as control to compare management impacts against. The systems are changing too rapidly for baseline to be relevant. This is also important because we often lack baseline data due to the size and remoteness in this region. The BEACONs team has identified a benchmark network to help inform this BLM plan. We ask that the BLM prioritize at least three levels of benchmarks: (a) existing CSUs which would be considered as adequate or minimal benchmarks; (b) connectivity or buffer areas around CSUs that incorporate BLM lands that would be additive to CSUs and desirable as minimal benchmarks; and (c) BLM lands that would serve as benchmarks in their own right. These aspects should be mapped and incorporated into planning alternatives (e.g., Alternative B would contain the most extensive benchmark network, including benchmarks within BLM lands and adjacent CSUs, Alternative C including at least partner CSU benchmarks, and alternative D, the least). By prioritizing other CSUs as benchmarks, BLM can leverage the capacity and funding from its partner agencies in order to carry out its management responsibilities. By prioritizing benchmarks entirely within the BLM lands ensures that BLM can do adaptive management regardless of partner participation. We believe that even Alternative D should recommend at least some benchmarks in lands previously identified as important for habitat connectivity. This is especially important for monitoring effects of intensive mineral and transportation permitting that may occur in Alternative D.
Our mutual goals of holistic large landscape planning and providing for connectivity would best be accomplished if BLM considered the areas illustrated in the map below as among the most important to retain in federal ownership and/or receive special management attention emphasizing watershed integrity and habitat connectivity.
We ask that a goal or objective addressing connectivity and ecological benchmarks be added to the Lands and Realty Concept Alternative: "Identify the most appropriate lands for habitat connectivity and ecological benchmarks in order to support adaptive management and balanced achievement of resource protection and resource development goals."
Using BEACONS, the landscape can be viewed as a matrix of varying land use intensities. By planning ahead, BLM can more efficiently avoid resource conflicts, environmental impacts, and costly delays to development projects. Land facet connectivity and BEACONS are two tools that BLM should use to most effectively allocate lands for the various multiple use purposes.
Figure 1. Northwest Boreal LCC analysis of potential connectivity corridors in the planning area. Red circles indicate important connectivity areas within the Dalton Highway corridor, and subject to the PLO 5150 withdrawal.
By adding the watershed and land connectivity measures we recommend for the original Kanuti River- and Kilolitna River-nominated ACEC areas, a small amount of BLM land area becomes additive to FWS lands in order to realize a huge conservation impact. In such a manner BLM can allocate a smaller amount of their own lands for conservation purposes and yet have a disproportionately large conservation impact by combining with the adjacent CSUs.

Table B-1
Alternatives

Stated goals and objectives include:

- Meet public needs for use authorizations such as rights-of-ways (ROWs), alternative energy sources, and permits white minimizing adverse impacts to resource values.
- Retain public lands with high resource values. Adjust land to consolidate public land holdings, acquire lands with high public resource values, and meet public and community needs.
- Once conveyances are complete, land ownership patterns in the planning area allow for efficient and effective management of the public lands, minimizing the number of small, isolated BLM parcels that are difficult to manage.
- Consolidate land management that sustains natural resources necessary for meeting subsistence needs.

The following comments apply to the block of BLM lands south of the eastern portion of Selawik National Wildlife Refuge. These adjacent BLM-managed lands are bordered to the south by Koyukuk NWR land. Currently, there are State-selected lands within this BLM area as well as several parcels not State selected that will remain under BLM management. We believe that for reasons of efficient management, landscape connectivity, public use, and resource protection, these lands between the two National Wildlife Refuges should remain federal public lands with limited issuance of rights-of-way for development. Supporting information is provided below.

Efficient management: Retaining BLM management of lands in this area will avoid the creation of small, isolated BLM islands surrounded by other lands. Landscape connectivity: Limiting the development that takes place in this slice of land between Selawik and Koyukuk NWRs will allow for greater wildlife usage of the lands and interconnection of the habitat within the two refuges. Large amounts of connected habitat are important in the face of environmental change to enable movement and shifting habitat use that follows shifting ecotypes. See the comments from Kanuti NWR for analyses and suggested methods for implementation. Connectivity models using methods robust to climate change are currently available for BLM to use.

Public use: Federally-qualified subsistence users in rural Northwest Alaska have extremely limited access to land status maps and other tools which can help them know where they are eligible to hunt under federal subsistence regulations. When boundaries or land conveyances create a complicated patchwork of land ownership, this adds to the confusion for rural residents who are the primary users of these lands and impedes their subsistence practices. Maintaining BLM land management between the two National Wildlife Refuges creates a large area of federal public lands, managed similarly, which can be more clearly understood by local users and which would facilitate public use.

Resource protection: As described above, the Selawik River and Kobuk River watersheds are valuable fish habitat. They host the only two spawning areas in the region for sheefish (inconnu). The Kobuk has a significant run of chum salmon, which contributes to the commercial salmon fishery in Kotzebue Sound, and both rivers have sizable populations of whitefish, pike, and burbot. The Selawik River is also of regional importance as a rearing area for juvenile fish due to its rich aquatic environment (Brown 2004). Taken together, these fish resources are vital to the subsistence economy of six villages and the regional hub of Kotzebue. In a 2010 community-based harvest survey, the village of Selawik harvested over 500,000 pounds of wild food, and four of the top five harvested resources were fish (ADF&G 2011). These high value fisheries deserve protection from adverse effects from rights-of-way, mining, and other developments on adjacent BLM lands.

Table B-1
Alternatives

The lands to the east and south of Selawik National Wildlife Refuge that fall within the Central Yukon RMP are also habitat for the Western Arctic Caribou Herd, the largest caribou herd in Alaska. These lands include both winter range for the herd as well as outer/peripheral range (Western Arctic Caribou Herd Working Group 2011). The Western Arctic Caribou Herd is a vital subsistence resource for over 25 communities, and protection of its habitat and migratory routes, as well as allowance of a buffer for shifting habitat use in future, is strongly advised for the Central Yukon RMP.
The conceptual alternatives presented at the Fairbanks public meeting appear to suggest BLM assigned increasing degrees of allocation across conceptual action alternatives without regard for establishing and maintaining landscape-scale priority conservation areas. For example the action alternatives for Land and Realty — Withdrawals, Public Land Order (PLO) 5150 — recommend in Alternative B — that most of the PLO (inner and outer) be retained, while alternative C lifts the PLO of the inner corridor along almost its entire length, and alternative D, the entire PLO (inner and outer) is lifted. A similar allocation thought process was employed for locatable mineral entry alternatives. We believe that mineral withdrawals and retention of the PLO 5150 withdrawal need to be at least partially carried into Alternatives C and D in order to achieve holistic landscape planning.
Loss of Access to Subsistence Resources wherever PLO 5150 is lifted. If PLO 5150 is lifted, subsequent state selection and conveyance of lands within the inner and/or outer corridor would result in loss of the federal subsistence priority for rural residents. AS 19.40.2 10 (the prohibition of off-road vehicles and the prohibition from using firearms within the corridor management area) would diminish subsistence opportunity for users residing within the corridor. ANILCA sections 811 and 1110 allow use of snowmachines and other means of transportation by local residents on all federal public land. During revisions of resource management plans in Alaska, the BLM is required to provide for reasonable access to subsistence resources according to these ANILCA provisions. Lifting the entire PLO 5150 could create significant conflicts with adjoining federal conservation unit mandates, refuge comprehensive conservation plans and Alaska National Wildlife Refuge purposes, which dictates that we must provide for continued subsistence opportunities. With the exception of important infrastructure development and services nodes (e.g., Yukon Crossing, Coldfoot, etc.), we recommend that PLO 5150 be retained in its entirety to help ensure that subsistence opportunity is afforded to the residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Dalton Highway Corridor Management Area.
History does not bode well for lands open to locatable mineral entry but recommended for withdrawal. An unknown number of acres (the acreage was not listed in the no action alternative) were recommended for withdrawal under the Utility Corridor RMP. To date, none of the mineral withdrawals have been finalized and these lands currently remain open to locatable mineral entry. "ANILCA § 1326(a) states that the executive branch shall not withdraw more than 5,000 acres in the aggregate of public lands within Alaska unless notice is provided in the Federal Register and to both Houses of Congress. At such point, the withdrawal shall "terminate unless Congress passes a joint resolution of approval within one year after the notice of such withdrawal has been submitted to Congress." As it stands it is not reasonable to expect in any of BLM's action alternatives (B, C, and D) that at any point in the future those lands recommended for withdrawal would actually be withdrawn so this makes this alternative not viable. We recommend instead an alternative means to achieving the purposes of the withdrawal, which would state "for any lands recommended for withdrawal, that these lands, in the interim, be identified and managed as lands with wilderness characteristics."

Table B-1
Alternatives

The Service believes it would be helpful to define the criteria used to determine "public lands with high resource values," lands with "high public resource values" and "unneeded withdrawals." Providing simple and clear descriptions will help facilitate a better understanding of the values being rated in this section, and aid in assessing alternatives.
Describing the characteristics used to identify both ROW corridors and ROW exclusion/avoidance areas; including maps of proposed routes, would help the reader distinguish and understand the differences among the alternatives.
Finally, the Service appreciates the objective to manage lands for sustained resource needs. Management plans assist in maintaining fish and wildlife populations within their habitats, and must be flexible to address the fluctuations of fish and wildlife habitat factors, including climate change, and human use (e.g., hunting, fishing and recreation) that can vary from year to year. Please describe the flexible nature of the management and how natural and climate related changes will be integrated into the decision making process.
We would like the BLM to consider it critically important to retain in federal ownership those lands that support high-value watersheds that flow into Koyukuk NWR (as named above: Indian River, Hogatza River, Dakli River, Wheeler Creek, Billy Hawk Creek, N. Fork Huslia River, Dulbi River, and Bear Creek Whakatna Creek).
Urban planners generally do not intentionally place conflicting land uses immediately adjacent to one another. Similarly, the BLM CYRMP land use plan should strive for graduated intensities of development moving away from Conservation System Units like Koyukuk NWR. We suggest that BLM recognize the importance of habitat connectivity corridors between Koyukuk NWR and Kanuti NWR to the northeast, to Nowitna NWR to the southeast, and to Innoko NWR to the south. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.
Urban planners generally do not intentionally place conflicting land uses immediately adjacent to one another. Similarly, the BLM CYRMP land use plan should strive for graduated intensities of development moving away from Conservation System Units like Nowitna NWR. We suggest that BLM recognize the importance of habitat connectivity corridors between Nowitna NWR and Koyukuk NWR to the northwest, and with Denali NP to the southeast. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.
We suggest that BLM recognize the importance of habitat connectivity corridors between Innoko/Kaiyuh Flats NWR and Koyukuk NWR to the north and Nowitna NWR to the east. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.
Ambler Road - activity for construction and affects after and related access from the corridor. Concern about how much public would be using the corridor and related issues. Access creep. No defined space around of Allakaket. Creep on the lands. Stress on the community. Allakaket has needs for goods transport and are looking at an over snow option from Bettles. In other communities, the concept of being able to control access is a big one. Boundaries are an issue.

Table B-1
Alternatives

Figure 2. Map of landscape linkages derived from a corridor design program in ArcMap (Magness and Robertson, 2016. Using Geodiversity to Connect Conservation Lands in the Central Yukon, Alaska).
Alternatives – Lands with Wilderness Characteristics
Alternative A
No comments.
Alternative B
…the lands adjacent to the three areas mentioned above: Arctic NWR near the Atigun River; Gates of the Arctic National Park west of the Dalton Highway; and the upper Kanuti River drainage, should all be included in the lands with wilderness characteristics acreage that get protected since this acreage still meets the Wilderness criteria for "size, naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation."
On page 12 we strongly agree with some of the criteria BLM proposes to determine which of the five million acres of LWC are included in Alternative C, specifically "Lands next to CSUs or Wildlife migration corridors or Watersheds that drain into CSUs." However, we disagree with the next set of criteria on page 12, including the more restrictive use of the conjunction "and." First, we find the following list too confusing and difficult to interpret without a map: "Low mineral potential with tow/medium/high certainty; Medium mineral potential with low/medium certainty; and High mineral potential with tow certainty. "Furthermore, use of the first list of criteria, in combination with the word "and" to the second set of criteria makes this seem more like a list of exceptions intended to minimize LWC. This would make it nearly impossible for BLM to provide the added protection and/or permitting scrutiny in watersheds that feed Kanuti NWR. We recommend a different approach using buffers, as described above. Instead, Alternative B should designate buffers around all CSUs and Alternative C should include buffers in the areas expected to see the greatest mineral and transportation development interest during the span of this plan (e.g., Kanuti periphery).
Alternative C
While Alternative C states that "wildlife migration corridors" would be managed for LWC, the document does not identify the wildlife species that would benefit from the designation, or explain what activities could impede wildlife migration in the corridors, absent their designation.
Alternative C also proposes managing for LWC on lands adjacent to existing CSUs, which effectively serve as buffer zones around Alaska's vast CSUs, even though these units have specific boundaries published in the Federal Register. The PAC does not include a description of the goals or purposes for the buffer zones; therefore, their underlying need is unclear.

Table B-1
Alternatives

On page 12 we strongly agree with some of the criteria BLM proposes to determine which of the five million acres of LWC are included in Alternative C, specifically "Lands next to CSUs or Wildlife migration corridors or Watersheds that drain into CSUs." However, we disagree with the next set of criteria on page 12, including the more restrictive use of the conjunction "and." First, we find the following list too confusing and difficult to interpret without a map: "Low mineral potential with tow/medium/high certainty; Medium mineral potential with low/medium certainty; and High mineral potential with tow certainty. "Furthermore, use of the first list of criteria, in combination with the word "and" to the second set of criteria makes this seem more like a list of exceptions intended to minimize LWC. This would make it nearly impossible for BLM to provide the added protection and/or permitting scrutiny in watersheds that feed Kanuti NWR. We recommend a different approach using buffers, as described above. Instead, Alternative B should designate buffers around all CSUs and Alternative C should include buffers in the areas expected to see the greatest mineral and transportation development interest during the span of this plan (e.g., Kanuti periphery).
Alternative Concept 3.3 - Lands with Wilderness Characteristics Alternatives Table Line #1: The Service would like to understand how consideration of mineral potential is a factor in determining wilderness characteristics. The Service recommends clarifying the land management criteria for Alternative C. Perhaps a detailed description on the ranking system will help the public understand the process used to determine what is and what is not considered "wilderness."
Alternative D
No comments.
New Alternative
All lands north of Cold Foot where the Brooks Range Mountains is within a day hike are the most valuable to me. These areas, with special mention of the lands around Sukakpak Mountain, Chandalar Shelf, and the tributaries of the Saganarvirtok River offer spectacular scenery, solitude, and quiet that are unparalleled elsewhere on the road system, as well as high quality fish and wildlife resources that I enjoy and depend upon. Though I think all lands within the planning area should be protected for their wilderness value, these areas deserve special recognition and their wilderness characteristics should be improved upon and protected.
…just north of Coldfoot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
I would like all lands within the planning area to be protected for the wilderness character they possess (all of them have it, so all should be protected).
Wilderness should be available to the common Alaskan and it is along the Dalton Highway corridor where this is truly possible.

Table B-1
Alternatives

Doyon generally opposes any designation of areas surrounding or adjacent to Doyon-owned lands in the planning area as areas where wilderness characteristics would be maintained. As an initial matter, many of these areas are subject to Doyon land selections and, therefore, are subject to potential conveyance to Doyon at some time in the future. Moreover, such designation could significantly impact Doyon's ability to obtain needed access across such lands.
In "Lands with Wilderness Characteristics" the Refuge Association and Friends suggest BLM specify goals and objectives for habitat connectivity to promote fisheries and wildlife conservation to fulfill subsistence opportunities on BLM lands peripheral to Kanuti, Yukon Flats, Arctic, Koyukuk, Nowitna, Innoko and Selawik National Wildlife Refuges.
Alternative Concept 3.3 - Lands with Wilderness Characteristics We suggest that BLM designate as a high-priority, the management of Lands with Wilderness Characteristics (LWC) in watersheds that are immediately adjacent to the Koyukuk NWR boundary. This would address our watershed and connectivity concerns expressed in the first two sections, above. Management for LWC qualities is especially important in the connectivity areas mentioned above.
Alternative Concept 3.3 - Lands with Wilderness Characteristics We suggest that BLM designate as a high-priority, the management of Lands with Wilderness Characteristics (LWC) in watersheds that are immediately adjacent to the Nowitna NWR boundary. This would address our watershed and connectivity concerns expressed in the first two sections, above. Management for LWC qualities is especially important in the connectivity areas mentioned above.
Alternative Concept 3.3 - Lands with Wilderness Characteristics We suggest that BLM designate as a high-priority, the management of Lands with Wilderness Characteristics (LWC) in watersheds that are immediately adjacent to the Innoko/Kaiyuh Flats NWR boundary. This would address our watershed and connectivity concerns expressed in the first two sections, above. Management for LWC qualities is especially important in the connectivity areas mentioned above.
Combination of Alternatives
Under Alternatives B & C the lands east of the Dietrich River (state selection priorities 3, 13 &14) in the Snowden Mountain area inside the pipeline corridor should be retained & managed as wilderness.
All BLM lands between the Pipeline Corridor and the Yukon Flats NWR should be retained and managed as wilderness. This would protect the wilderness character of the upper Jim River and those portions of the upper South Fork of the Koyukuk and its Mosquito Fork that are not State or native owned. It would also provide a buffer zone for the Yukon Flats NWR.
The Nigu/Iteriak should be managed for its wilderness characteristics. This would protect the wilderness experience of floating out of the Gates of the Arctic National Park to the Etivluk River & the Colville River.
The parcel of BLM land at the head of Your Creek, adjacent to the Arctic NWR needs to be managed as wilderness. This is a major entrance point into the Cloud Peak region of the Arctic National Wildlife Refuge.
We recommend that the Bureau include management of lands with wilderness characteristics in the outer corridor north of the Yukon river in Alternatives B and C. This would not be inconsistent with the planning criteria because the inner corridor would remain available for whatever utilities may be needed.

Table B-1
Alternatives

BLM should be absolutely clear going forward as to its goals and objectives with regard to lands with wilderness characteristics.
BLM should be absolutely clear in presenting how it evaluates lands with wilderness characteristics and the various potential outcomes of this evaluation.
BLM should be absolutely clear in presenting how it evaluates lands with wilderness characteristics and the various potential outcomes of this evaluation.
BLM also must ensure that its decisions are based upon careful and reasoned consideration of the relevant factors set forth in BLM policy and guidance governing the consideration of lands with wilderness characteristics.
One important factor for consideration is "whether the lands can be effectively managed to protect their wilderness characteristics."
Another factor that BLM must consider and document is "the extent to which other resource values and uses of lands with wilderness characteristics would be forgone or adversely affected if the wilderness characteristics are protected."
Based upon a reasonable consideration of these factors, much of the land area in the vicinity of Doyon-owned or selected lands is unlikely to be suitable for management to protect wilderness characteristics. Much of this land area consists of lands that have been selected by Doyon under ANCSA and that are likely to be conveyed to Doyon during the term of the RMP, limiting BLM's ability to protect wilderness characteristics on the lands over the long term.
To the extent that lands to be considered for maintenance of wilderness characteristics may surround or be adjacent to Doyon owned lands, Doyon will require access to non-federal inholdings. Such access, to which Doyon is entitled under the provisions of ANILCA, could limit BLM's ability to effectively manage the lands to protect their wilderness characteristics.
…proposals to designate areas in the vicinity of Doyon-owned or selected lands as areas where wilderness characteristics would be protected are unlikely to be supported by BLM policy and guidance governing the consideration of lands with wilderness characteristics in land use planning.
Winter access should only be on designated trail routes, which are outside of the spawning habitat of salmon, and whitefish. Over ice access with adequate ice thickness to support equipment in winter is preferred. Driving heavy equipment up and down the South Fork Koyukuk and other drainages for access in open water season is not responsible resource management.
After reading through your matrix of alternatives the one thing that jumps out to me the most is that consideration is being made that would allow the State (illegally) to select portions of the Dalton Highway Corridor by modifying PLO 5150. I am in full agreement with Jack Reakoff's comments to you related to this document & the facts he presented that clearly state the laws related to making any changes to PLO 5150. Please note my full endorsement of his comments & conclusions.
I would like to see the BLM retain all management of Dalton Utility Corridor lands that they currently manage, and make no provisions for current or future "land swaps" with State agencies within the corridor.

Table B-1
Alternatives

Other aspects to consider for favoring continued BLM corridor management would be the fact that their utility corridor lands are adjacent with sister DOI lands (NPS, USF&W) in places bordering the corridor, and naturally concur for better management of all these DOI lands as a whole for sustained purpose & mission of each.
AMA strongly opposes the designation of, and special restrictions attached to, "Lands with Wilderness Characteristics." The concept is inherently flawed in Alaska because most BLM lands currently exhibit "wilderness characteristics" due to the lack of development and infrastructure. By managing with a goal to protect wilderness, BLM is essentially establishing Wilderness areas. In 1980, Congress through ANILCA determined the over 100 million acres of Alaska lands that should be Wilderness, and specifically excluded BLM lands from Wilderness designations. AMA strenuously objects to including "lands next to CSUs" (page 12, Alternative C), since those CSU and Wilderness boundaries were extensively studied when ANILCA was being debated, and all necessary "buffers" were considered and included as part of those designations. AMA strongly opposes "buffering the buffers."
To meet these goals the Northern Alaska Environmental Center strongly requests that the BLM not lift any PLO 5150 withdrawals on any lands adjacent to a conservation unit. These lands belong to the American public and have increased value given the development that occurs (or is anticipated to occur) near TAPS. Of particular importance are the Arctic National Wildlife Refuge, Kanuti National Wildlife Refuge, and Gates of the Arctic National Park and Preserve.
We request that lands adjacent to conservation units be included for LWC along the Dalton Highway corridor. In particular areas in the "outer corridor" that abut the Arctic National Wildlife Refuge near the Atigun River, Gates of the Arctic National Park and Preserve (to the west), and all of the upper Kanuti River watershed.
We are very supportive of BLM's preliminary identification of 11 million acres of land with wilderness character. As the planning process moves forward, BLM should ensure that lands with wilderness character are of substantial size and connected to other wilderness-quality areas or conservation units.
Alternative Concept 3.3 - Lands with Wilderness Characteristics The Refuge Association and Friends strongly support the primary goal.
We are concerned that broad-scale designations and restrictions will diminish the importance of mitigating project-specific impacts across the planning area and request BLM re-consider the need for the proposed special designations and withdrawals identified in the PAC.
As stated in our scoping comments, the State does not support managing lands for wilderness characteristics (LWC).
The LWC overview appears to misinterpret ANILCA Section 1316 as being applicable only to subsistence uses, when ANILCA allows for temporary facilities related to all take of fish and wildlife on public lands. We reiterate our previous request to clarify that this allowance is not limited to subsistence use. The recently finalized EIRMP correctly references this allowance as "temporary structures and equipment placement related to hunting, fishing, and trapping" (p. 50, 51 Fortymile ROD, for example). We request the CYRMP similarly recognize this important provision.

Table B-1
Alternatives

Some alternatives propose managing for wilderness characteristics within wildlife migration corridors; however, the PAC does not provide enough information, such as locations, size of areas, or species, to evaluate the proposal. It is also unclear why, if wildlife migration is the driving concern for the proposed management, these areas would be managed to protect wilderness characteristics instead of more specifically for wildlife habitat.
Page 11, Lands with Wilderness Characteristics, Goal: The goal indicates that BLM intends to manage all lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation, which would apply to most BLM lands within the planning area. To be consistent with BLM policy, the goal should instead be to determine which lands with wilderness characteristics are to managed to protect wilderness characteristics. We recommend the following edit: Where determined appropriate, manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation.
Page 11, Lands with Wilderness Characteristics, objective: We request the second objective bullet more accurately reflect the Wilderness Act, which states that lands provide solitude or primitive and unconfined recreation, but not necessarily both. We also recommend removing the word "nonmechanical" because BLM's stated intention is to allow ANILCA-specified uses on lands that are managed to protect wilderness characteristics, and ANILCA Section 1110(a) includes "non-motorized surface transportation methods." Bicycles are an example of surface transportation that is non-motorized but mechanical. Likewise, we request that "non-motorized surface transportation methods" be added to the list of ANILCA-specified uses that would be compatible with lands with wilderness characteristics. We request the following edit: Outstanding opportunities for solitude (when the sights, sounds, and evidence of other people are rare or infrequent and where visitors can be isolated, alone, or secluded from others) and (strikeout) or outstanding opportunities for primitive and unconfined recreation (where the use of the area would be through nonmotorized, nonmechanical (strikeout) means and where minimal developed recreation facilities are encountered).
Soil composition, permafrost characteristics, and ice content data should ideally be used to help determine where OHV traffic and ROW's are allowed. New permafrost maps by Jorgenson and ice-content maps could be used to help identify where sensitive soils exist throughout the region. High ice-content regions should be identified and protected as ACEC's.
We agree with the main goal to: "Manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation"; and the objective to maintain: "A high degree of naturalness (where lands and resources are affected primarily by the forces of nature and where the imprint of human activity is substantially unnoticeable)".

Table B-1
Alternatives

In the overview paragraph for locatable minerals (p4-) we would like to see more clarity as to which "Lands with Wilderness Characteristics" (LWC) would be recommended to be actually managed as "wilderness" under Alternatives B and C. Within the concept area of LWCs, we believe the BLM should also include and implement goals and objectives for habitat connectivity, as mentioned above. There should be a goal/objective stating that areas managed to maintain LWC would also be managed for habitat connectivity. We suggest BLM include strong recognition that any area managed for the connectivity goal would also concurrently enhance a fisheries and wildlife productivity goal which would enable BLM to meet subsistence harvest demands on their lands. Furthermore, such a goal would also allow FWS to meet their goals for fisheries, wildlife productivity, and subsistence on connected refuge lands. BLM's recognition of LWC and connectivity goals should support BLM efforts to allow for resilience in the face of future climate change or other stressor-driven trends.
3.3 Lands with Wilderness Characteristics We support the inclusion of lands near CSUs, wildlife migration corridors, and watersheds that flow onto CSUs to be managed for their Wilderness Characteristics. Managing for these values will support many of the goals within the CY RMP and those of the neighboring CSUs with regard to resource management, subsistence, and recreation.
History does not bode well for lands open to locatable mineral entry but recommended for withdrawal. An unknown number of acres (the acreage was not listed in the no action alternative) were recommended for withdrawal under the Utility Corridor RMP. To date, none of the mineral withdrawals have been finalized and these lands currently remain open to locatable mineral entry. "ANILCA § 1326(a) states that the executive branch shall not withdraw more than 5,000 acres in the aggregate of public lands within Alaska unless notice is provided in the Federal Register and to both Houses of Congress. At such point, the withdrawal shall "terminate unless Congress passes a joint resolution of approval within one year after the notice of such withdrawal has been submitted to Congress." As it stands it is not reasonable to expect in any of BLM's action alternatives (B, C, and D) that at any point in the future those lands recommended for withdrawal would actually be withdrawn so this makes this alternative not viable. We recommend instead an alternative means to achieving the purposes of the withdrawal, which would state "for any lands recommended for withdrawal, that these lands, in the interim, be identified and managed as lands with wilderness characteristics."
Alternatives – Areas of Critical Environmental Concern (ACECs)
Alternative A
Line #3: Alternative A includes a list of Areas of Critical Environment Concern (ACECs) and Research Natural Areas (RNAs) that should be updated. These recommendations "were never implemented" and it would be helpful for the reader to evaluate an updated list of those areas still feasible for recommendation. For example, are all these areas still federal land, or have some areas been transferred to the State of Alaska? Also, please consider providing a map depicting the listed areas to help facilitate a better understanding of the spatial distribution of these areas.
Alternative B
I would like to see all of the upper part of the Kanuti River drainage, from the border of the Kanuti Wildlife Refuge to the border of the Arctic Wildlife Refuge, included as an ACEC/RNA.
All ACEC's in Alternative B should be withdrawn from mineral entry.

Table B-1
Alternatives

Does Alternative B (most conservation oriented alternative) Include the ACEC traditional use areas we requested?
Alternative C
Alternative Concept 3.4 - Areas of Critical Environmental Concern (ACECs) Line #2: Special management attention is necessary for areas identified as important fish and wildlife habitat. ACECs can protect notable or unique resources in the designated area while providing connectedness and corridors among all CSUs. The Service welcomes the opportunity to provide input on management of the ACECs under Alternative C. The Service also recommends providing a map of the proposed ACECs to help assess alternatives.
Alternative D
No comments.
New Alternative
Questions about ACEC nomination from Ruby, where is the Ruby ACEC nomination? Discussion about the later nomination and that BLM is still looking at this. Further discussion about traditional use areas and how this mixes with the relevance and importance criteria for ACECs. Request that BLM come back to Ruby to work on traditional use areas and how to protect those.
Use north of the Yukon across from Ruby is for winter trapping, some fall moose hunting but not much use in the summer. Limited recreational mining in the summer- very low use. Requires a jet boat to get up there. Trapline trail in this area. These areas are included in the mapped areas submitted for the ACEC nomination.
One of the things that surprised me was the Nigu River ACEC. It is probably one of the most heavily used rivers north of the corridor and it is not being considered for an ACEC, the report says that it would not be considered for carrying forward as an ACEC under all alternatives. I think this is a mistake and should be considered in at least B and C. It gets quite a bit of use for hunting and recreational use. It is a spectacular river. The only other river used more might be the Atigun Gorge.
Areas of highest concern for me include areas within a day hike of the Brooks Range mountains (between Coldfoot and Toolik essentially), where I access most of the fish, wildlife, and wilderness resources for me and my family. I strongly support BLM creating and/or protecting more and larger spans of land via ACEC's as described in scenario B in these areas, as well as the Ray Mountains and Hodzana Hills.
We suggest that BLM undertake a reevaluation of Areas of Critical Environmental Concern (ACEC) boundaries in the context of watersheds that feed CSUs. We believe that the added permitting scrutiny an ACEC affords is justified in order to minimize impacts to CSUs downstream of BLM managed lands. Some of our refuge offices have proposed changes or boundary adjustments, along with justifications, for the ACECs that BLM tentatively identified as meeting relevance and importance criteria.
Alternative Concept 3.4 — ACECs We support the full extent of the BLM-nominated ACECs in watersheds that feed Nowitna NWR: Sulukna and Sethkokna. We would encourage BLM to reconsider and designate Telsitna-Titna drainages as an ACEC. We will provide our justification in the near future. The added permitting scrutiny that an ACEC may afford is needed so that Nowitna NWR may be able to fulfil its ANILCA purposes.

Table B-1
Alternatives

Combination of Alternatives
First, in the final delineations of the Upper Kanuti River ACEC and Ray Mountains/Tozitna River ACEC, it appears that perhaps only a handful of years of radio-collar location data were used to define the calving grounds of the Hodzana and Ray Mountains Caribou Herds, respectively. We ask whether a few years of collar data comprise an adequate sample for making a long-term, 20—30-year, planning-level decision. We would suggest that extent of calving and wintering areas are probably better defined on multi-decadal scales. We understand that agencies are rarely able to fund decades of collar data for small caribou herds; therefore, BLM should consult similar data spanning longer time periods obtained for other herds elsewhere. For example, with the larger well known herds in Alaska that have long-term collar data (e.g., Porcupine Herd, PCH, and Western Arctic Herd, WAH), the habitat-use footprint defined by several decades of collar data is usually much greater than one defined by only a few years of collar data (PCMB 2016). We also know that studies using other techniques, such as shed antler distribution and weathering pattern, have shown much wider ranges than are currently known with collar data (Miller et al. 2013).
Looking at the long-term history of most montane caribou herds of interior Alaska, it appears that extent of both calving and winter ranges have varied significantly over time. We therefore recommend you consider the recent collar demarcated area of the Upper Kanuti River ACEC as only a minimal representation of calving range for the Hodzana Herd. For the Ray Mountains/Tozitna River ACEC area, we are familiar with movements of the Ray Mountains Caribou Herd. We have documented that they rely on the entire landscape, from the calving ground's center in the Ray Mountains all the way to the lichen-rich southern portion of Kanuti NWR. The latter area provides Allakaket with an important caribou subsistence hunting opportunity, especially when Western Arctic Caribou cannot be found near the village (see Holen et al. 2012; Note: there are special provisions in the ADFG and Federal subsistence regulations recognizing this hunt. FWS and local village TEK observations indicate regular and significant use of the habitats along the Ray Mountains/southern Kanuti Refuge transition). Therefore, we recommend that you revise both boundaries by providing an adequate buffer that more likely encompasses the long-term usage area, allows for "climate smart" adaptation, including range shifts, and enhances village food security into the future. For caribou habitat protection an ACEC, or special management area, should specify measures, such as mining withdrawals and limited transportation corridor development, because these development activities have been shown to have significant impacts on caribou movements and productivity elsewhere in Alaska (Nellemann and Cameron 1996, Cameron, Dau 2015).
Doyon has some concerns with some (not all) ACECs. Doyon would like more input about what these are and what the management considerations will be.
The second comment is regarding ACECs, if there is a history of use within an ACEC or private property in an ACEC how will these be reflected and accounted for in the management of that ACEC?
Similarly, if there were a number of ACECs nominated by tribes or proposals based on traditional ecological knowledge, making sure all those show up in the maps whether BLM wants to move forward them or not, it is important to show them as proposed. In the Eastern Interior plan this made a big difference by the end. Finally, ACECs should be meaningful. They should reflect the values of the resources that are there.
For some reason the Nigu/Iteriak area was recommended for opening to mineral entry under all alternatives. This is a major river corridor for floaters & is included as part of the Noatak National Preserve. Why was this ACEC recommended for opening to mineral entry?

Table B-1
Alternatives

Fewer, larger ACEC's that provide continuous linkages across BLM lands to other federal lands, especially refuges and parklands, are inherently more valuable to fish, wildlife, and habitat resources (and would therefore better protect the resources that I value and enjoy). Having smaller ACECs would contribute to fragmentation of the landscape and would harm fish, wildlife, and habitat resources by reducing these resources' ability to move as needed in response to food availability, habitat quality, seasonal shifts, and climate change.
We'd like the Bureau of Land Management (BLM) to designate special management areas as well as Areas of Critical Environmental Concern (ACEC). We assert that all contributing streams of the Kanuti River, all stems of the Koyukuk River, headwater stems of the Chandalar river system, Jim, Dietrich, Atigun and the Sagavanirktok rivers, as well as Galbraith and Toolik lakes should be protected to sustain their substantial, intact, undisturbed, and complex contributions to multi faceted and connected ecosystems.
Spooky Valley should be considered for an ACEC because of the presence of near-surface radioactive earth minerals (Uranium), which would be physically disturbed to reach high concentrations of lead and zinc, not to mention silver, tin, tungsten, and bismuth. Spooky Valley and the Ray Mountains need special consideration to prevent land disturbances that have consequential downwind and downstream affects—dispersal of radon and radium dust layers that would affect the entire ecosystem.
ABHA believes each alternative should have special management areas and Areas of Critical Environmental Concern (ACEC) to sustain the best habitat for important species like moose, sheep, caribou, muskox, wolf, grizzly bear, salmon and whitefish; habitat quality and ecosystem integrity; thereby fulfilling the BLM's stated goal to manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation. Two critical species are sheep and caribou because they are extremely sensitive to environmental changes and increased hunting pressure.
The Ray Mountains and Hodzana uplands deserves special consideration as either ACECs or as part of the proposed BCA to protect the habitat for the resident caribou herds in these two small ranges.
Doyon owns significant land holdings in the areas of the villages of Kaltag, Galena, Ruby, Tanana, and Hughes. As a result, we noted, significant portions of the Nulato Hills (CY) ACEC, Dulbi-Kaiyuh Mountains Subunit ACEC, and Galena Mountain ACEC, among others, are no longer in federal land status, and should be removed formally from the ACECs; such non-federal lands are not subject to federal management jurisdiction. We further noted that other areas within the ACECs may no longer be appropriate for continued designation because of the status of adjacent lands and/or for other reasons. Doyon here reiterates the request to drop these areas from ACEC management.
Doyon also urged BLM not to propose the designation of any new ACECs that would occupy lands selected by Doyon under ANCSA or surround lands that already have been conveyed to Doyon.
Given the size and scope of these proposals, and their potential implications for multiple use management and impacts on non-federal landowners and local communities, it is absolutely imperative that decisions regarding their designation and management be transparent, fully supported by current and sound peer-reviewed science, and consistent with the statutory language.

Table B-1
Alternatives

As reflected in the November 2015 ACEC Report and Alternatives B and C, and severely in the recently-completed Eastern Interior RMP planning process, the tendency of the current round of planning efforts in Alaska appears to substantially favor expansion of ACECs in a way that Doyon believes was never anticipated by the enactment of FLPMA. Doyon accordingly believes that these decisions must be subjected to greater scrutiny—internal and external—as part of BLM's land management planning process.
Similar to other ACECs designated to protect important salmon spawning habitat, it is unlikely that entire drainage basins, including all associated uplands and non-fish-bearing streams, would require special management to protect the important habitats located within the drainages. Because salmon spawning habitats listed in the Anadromous Waters Catalog ("AWC") receive additional statutory protections from the State of Alaska, it is unclear what additional drainage-wide special management would be required to protect salmon spawning habitat and why.
Importantly, the ACEC Report and Preliminary Alternatives Concepts also fail to support any finding of a threat of irreparable damage or that certain special management measures are necessary to prevent such damage. The only risk identified in the ACEC Report's discussion of the Accomplishment Creek ACEC appears to be that "[v]isitor use of the Dalton Highway is . . . increasing with improved road conditions" and that, "[a]s a result, populations of Dolly Varden will continue to come under increased sport fishing pressure from anglers accessing the Sagavanirktok River drainage via the Dalton Highway." ACEC Report, p. 3. The ACEC Report further states that, "The lack of overwintering habitat is the major limiting factor to survival for arctic fish species. The springs provide a source of winter flow and small habitat refuges needed for fish survival." ACEC Report, p. 20. But it doesn't identify any threat of irreparable damage to the habitat. Yet, Alternative B specifies the following special management measures for this ACEC: recommended withdrawal from locatable minerals; ROW exclusion; and summer travel management closure. Preliminary Alternatives Concepts, p. 20. Alternative C's proposed special management measures are ROW avoidance within the 100-year floodplain and exclusion in known overwintering habitat or known spawning areas, and limiting travel to designated routes or trails. Id. The documentation, however, includes no showing of irreparable damage and draws no rational connection explaining how the proposed special management measures are necessary to protect the habitat and prevent such damage.
The proposed Alatna River ACEC discussion suffers from the same deficiency. BLM decided to carry forward as the Alatna River ACEC a nomination by the U.S. Fish and Wildlife Service ("USFWS") for approximately 5,500 acres to protect whitefish spawning habitat in the Upper Koyukuk River drainage, identifying in the Preliminary Alternatives Concepts the same special management measures as for the Accomplishment Creek ACEC. ACEC Report, p. 58; Preliminary Alternatives Concepts, p. 20. BLM, however, has neither identified any threat of irreparable damage to this habitat nor explained why these special management measures might be necessary to protect the habitat and prevent such damage. In fact, even BLM's characterization of the USFWS's nomination suggests that special management measures may not be necessary

Table B-1
Alternatives

Areas of high fish resource values in the planning area will be verified through a Watershed Aquatic Resource Value rating index developed for the Central Yukon Field Office in conjunction with this plan. Once completed, these data will help guide land use allocation and management decisions related to fisheries resources. From the available mapping information, it is uncertain whether all of these areas will fall within ACECs, or if they will function as de facto ACECs outside of ACECs. It is also unclear how specifically they will be used to allocate and manage land and whether their management prescriptions will be similar to or additive to the eventual management prescriptions for ACECs.
BLM, in its ACEC Report and Preliminary Alternatives Concepts, fails to explain how including additional habitat in new ACECs and imposing the special management measures identified in the Preliminary Alternatives Concepts will help protect crucial caribou habitat, particularly given the reasons that BLM and others have identified for any population limitations or declines. In the discussion of the Galena Mountain Caribou ACEC, BLM states that the Galena Mountain Caribou Herd "size is approximately 125 animals and is in decline due to low recruitment and calf survival." ACEC Report, p. 92. A 2015 ADF&G Caribou Management Report on the Galena Mountain, Ray Mountains, Wolf Mountain, Hodzana Hills herds similarly concluded that "[p]oor survival due to predation is likely the primary factor restricting herd growth." ADF&G Caribou Management Report, pp. 13-7 – 13-8. Yet, in the next sentence after attributing the population decline to a low natural increase in population and predation, BLM states, "Therefore, the BLM recommends that the ACEC boundaries be expanded to include BLM-managed lands within the core range of the Galena Mountain Caribou Herd." ACEC Report, p. 92. The connection between the cause and recommendation, and then the proposed special management measures in the Preliminary Alternatives Concepts, is not at all clear.
Combined, the Galena Mountains Caribou, Ray Mountains, and Jim River proposed ACEC expansions could result in essentially 2 million acres being withdrawn from mineral extraction and off-limits or restricted to ROW access in order to protect approximately 3,450 caribou—nearly 600 acres per resident caribou. The largest herd in Alaska, the 348,000-animal Western Arctic herd, a migratory herd, ranges over an area of 140,000 square miles, or about 250 acres per migratory caribou. Given that the Galena Mountain, Rays Mountains, Wolf Mountain, and Hodzana Hills herds are resident, not migratory, it is unclear why BLM appears to believe that these herds need more than twice the habitat area, relative to their number, of the tundra ecotypes.
As proposed, these ACECs would impose use and access restrictions on millions of acres of lands purportedly to protect habitat for several thousand caribou. Particularly given the identification of small population size and predation (primarily from black bears) as the cause of limitations or declines in herd size, it would seem to be a more effective approach to management to address impacts and mitigation on a site- and project-specific basis, consistent with BLM general management of public lands.
BLM has many existing options independent of ACEC designation to protect raptor nests, including buffers around the nests with occupancy restrictions or timing restrictions, or both. BLM and other agencies have used these options for decades to successfully protect breeding raptors and their nests. Therefore, the protection of raptor nests via an ACEC does not meet the requirement for special management attention.
Special management attention generally should be directed at the causes identified as threatening the values, resources, systems, or processes and responsible for the irreparable damage that must be prevented.

Table B-1
Alternatives

BLM's decisions must be grounded in scientific evidence and reflect a rational connection between this evidence and the decisions ultimately made.
I oppose not only most current ACECs under Alternative A, but also the extensive additional ACECs proposed under Alternatives B and C.
I oppose not only most current ACECs under Alternative A, but also the extensive additional ACECs proposed under Alternatives Band C.
AMA opposes most current ACECs under Alternative A, as well as the extensive additional ACECs proposed under Alternatives B and C. Many of the ACECs already in existence under Alternative A, the current plan, as well as the numerous and extensive additional ACECs in both Alternatives B and C fail to meet the criteria for ACEC designations.
The ACECs are much larger than necessary to protect any resources indicated as the justification for the designations. For example entire watersheds would not require ACEC designation to protect a fishery in a specific river or stream
The proposed ACECs purport to be needed to provide protection for resources that are already extensively protected by existing state and federal statutes and regulations, including BLM's own policies and regulations. As such, BLM has provided no indication of why the existing regulatory framework is inadequate to protect any specific resource. These proposed ACECs are not necessary. AMA has raised this concern in past comments on this plan and on the Eastern Interior RMP, and BLM has failed to justify why additional regulation would be necessary for ANY proposed ACECs.
Most proposed ACECs, particularly under Alternative B, will include a prohibition on locatable mineral entry, without ANY justification or explanation of alleged conflicts between mineral entry and the resources the ACECs purport to protect. Existing state and federal regulations provide extensive protections for water quality and fish, and existing laws require reclamation of land, allow for seasonal restrictions and afford other protections. Blanket prohibition of mineral entry is not justified by any resource protection need.
For the various reasons previously stated, if any ACECs are established, they should not be closed to locatable mineral entry and should not be ROW Exclusion Areas.
To meet this goal we strongly request that the border of the upper Kanuti ACEC be enhanced to include the entirety of the of the Kanuti River drainage—from the border of the Kanuti National Wildlife Refuge to the border of the Arctic National Wildlife Refuge.
ACECs need to include entire watersheds, migration routes (or known ranges), and water quality and quantity for waterfowl and fish spawning habitat.
We support the inclusion of qualified ACECs within this resource management plan.
In addition to the 18 existing ACECs within the planning area, we support the expansion and incorporation of new areas under this designation. As this planning process moves forward, we also encourage BLM to support tribally nominated ACECs. These areas, recognized by residents of the region for their ecological and traditional importance, warrant designation and effective management to ensure their values.

Table B-1
Alternatives

We also support the inclusion of RNAs within this resource management plan. RNA designation helps to facilitate invaluable science and contributes to BLM's multiple-use mandate. The Toolik Lake RNA, used extensively by the University of Alaska Fairbanks' well-known Toolik Lake Field Station, exemplifies this point.
I oppose not only most current ACECs under Alternative A, but also the extensive additional ACECs proposed under Alternatives B and C.
Prioritizing and protecting traditionally-important values, sensitive areas and critical watersheds will help preserve the important cultural and biodiversity core of the Central Yukon planning area while still allowing for development in suitable areas. This can be partly accomplished by the creation of enduring administrative protections as called for by tribal communities that have nominated Areas of Critical Environmental Concern, hoping to maintain landscape productivity and sustain the diverse and intact ecosystems supporting traditional subsistence lifestyles.
Alternative Concept 3.4 – ACECs The Refuge Association and Friends agree with the goal to: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities" (p13).
We suggest BLM consider expanding the boundaries of the upper Kanuti ACEC and Ray Mountains/Ishtalitna ACEC or include strategic buffer areas.
BLM proposes protective measures for the South Fork but no similar measures for the Kanuti where villages of Allakaket, Alatna, and Hughes rely upon salmon and whitefish.
TMC objects to Alternatives Band C as presented with 33 ACEC's and RNA's proposed. The numerous ACEC's proposed within these alternatives are a result of a separate solicitation dated May 1, 2014 asking for ACEC nominations. When I first saw the solicitation I complained to the appropriate contact from BLM that the solicitation only requested proposals for new ACECs or expanding old ones with no option requesting removal of an ACEC. She said that I could propose removing an ACEC, but the right to do so was never added as an option to the solicitation for more ACEC's that were subsequently sent out to the public. This solicitation generated the nomination of numerous new ACEC's and expanded existing ones. It resulted in numerous ACEC's with acreages far and above the norm for other planning units under BLM's plans. In the CYRMP Areas of Critical Environmental Concern document dated November 2015 we went from 1,796,260 acres of existing ACEC's and RNA's to 5,722,360 acres of ACEC's and RNA's, an increase of 219%. For perspective, the proposed area of ACEC's and RNA's is greater than each of the states of RI, DE, CT, and NJ. Essentially, as a result of this solicitation, the range of alternatives has become highly weighted towards ACEC establishment. This has injected a bias in the plan that seriously detracts from management issues including the BLM's mandate to provide for multiple-use opportunities.
The costs of ACEC management should be highlighted in the alternative descriptions and given consideration within the plan.
We are concerned that broad-scale designations and restrictions will diminish the importance of mitigating project-specific impacts across the planning area and request BLM re-consider the need for the proposed special designations and withdrawals identified in the PAC.

Table B-1
Alternatives

It is important that access to and from airports are not affected by ROW exclusions areas, as well as ACECs, SRMAs, ERMAs. The following is a list of airports and M&O camps located along the Dalton corridor, which need to be recognized and identified throughout the draft plan and on all maps.

Airports

- Deadhorse
- Galbrath Lake
- Chandalar Lake
- Wiseman
- Coldfoot
- Prospect Creek
- Livengood Camp

M&O Camps

- Deadhorse
- Sag River
- Chandelar
- Coldfoot
- Jim River
- Seven Mile
- Livengood
- Manley Hot Springs

We request BLM explain in specific detail why the ACECs are needed, including the tie between the size of the ACECs and the intended protections to resources.

ADF&G biologists view only the Galena Mountain Caribou ACEC as having critical habitat for wildlife in accordance with BLM's relevance and importance criteria. In addition, no critical issues were identified in the PAC or ACEC Report; therefore, none of the newly nominated or expanded ACECs appear to address a specific problem requiring immediate action.

As noted in our scoping comments, there are 34 existing ACECs or RNAs within the planning area, but only 13 have special management requirements (from the Utility Corridor RMP), and just 5 have a special management plan. We question the need to retain the existing ACECs that for decades have never been subject to special management, which is one of the requirements for initial ACEC designation.

We are also concerned that although listing the bookend alternatives of 2 ACECs (Alternative D) and 31 ACECs (Alternatives B and C) does represent a full range of alternatives, it does not provide any insight into what groupings of ACECs BLM would find logical or necessary.

We recommend BLM develop alternatives which are reasonable enough to be selected as the preferred alternative.

Table B-1
Alternatives

Justification provided for the ACECs with Fish/Riparian values relies on the logic that riparian resources constitute 3% of the BLM managed lands in the planning area; therefore, they are rare on a regional basis and as such, meet the ACEC importance criteria. The rationale also deems the Fish/Riparian values important because riparian resources perform a disproportionate number of biological and physical functions. Using this logic, virtually any riparian resource would meet the importance criteria. On that basis, there is virtually no difference between the Fish/Riparian values within the ACECs as compared to those outside the ACECs. We request BLM reevaluate the ACECs adhering more closely to BLM guidance and develop alternatives accordingly.
We request BLM specify criteria for identifying critical spawning areas, provide documentation of the critical spawning areas identified in the planning area, and clarify whether the entire drainage will be treated equally in terms of protections, or whether the critical spawning areas themselves will be managed differently to provide more specific protection. We also request that BLM demonstrate why existing state management and regulations are insufficient in protecting spawning areas to justify the need for the overlaying ACEC designation.
…numerous ACECs with ROW exclusion or avoidance areas as special management conflict with the Dalton Highway and the Trans Alaska Pipeline System (TAPS). For example, the proposed restrictions for the South Fork Koyukuk River, Jim River, Upper Kanuti River, and Sukakpak Mountain ACECs need to be modified to resolve this issue.
We recommend BLM maintain the Existing Galena Mountain Caribou ACEC. The existing ACEC correctly prioritizes calving grounds of the Galena Mountain Caribou and an expansion of the ACEC will dilute the effective priority of that important habitat, which has already been designated. This area is not accessible by OHV; therefore, it is unclear why the proposed OHV restrictions are necessary. If intended for those under BLM permit, the plan should clarify.
Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the existing Dulbi River ACEC; therefore, the ACEC is unnecessary and should not be carried forward into the draft plan. Identified wildlife use patterns are very low, as is use of the area by the public. Since the DM812 permit hunt was established in 2004, an average of 31 permits were issued annually. An average of 74% of permittees did not hunt, and an average of five moose were harvested annually over the 12-year period. An average of 1.7 hunters harvested 0.5 moose annually on the RM834 permit in Unit 21C. The remoteness of the area is self-regulating.
Spooky Valley RNA/ACEC, Ray Mountains/Tozitna River ACEC, Upper Kanuti River ACEC This is a combined comment to address similar concerns regarding the proposed Spooky Valley/Ray Mountains/Upper Kanuti River ACECs. Patterns of public use are very low in the Spooky Valley area; therefore, the area should not be designated an ACEC given the limited impacts and need for special management. In fact, hunters may be the only known users of the area. Hunter use and harvest are self-regulating due to the remoteness and limited landing sites for aircraft (see table below). Use of the four small non-migratory herds listed below is not significant enough to warrant access restrictions based on wildlife resource use or potential habitat damage concerns. The BLM should support research to identify and prioritize calving ground identification for the Ray Mountain and Hodzana Hills herds. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area.

Table B-1
Alternatives

Use is limited on the Upper Kanuti drainage, primarily to within 1 mile and less of the Dalton Highway by summer fishermen, and provides a unique recreational opportunity for a short section given the extensive length of river. Special management needs, such as safe vehicle pullouts at river crossings, do not need a special designation to be improved; those actions can be justified under current management. Use at the Kanuti River crossing does not justify needing special management, which is required for ACEC designation. Fewer than 4 hunt groups/year use the Kanuti River access at the DHCMA for hunting moose or caribou. Radio-collaring studies of moose have demonstrated there were no substantial migrations between the DHCMA, GAAR, or KNWR (Joly et al. 2015). Radio-collaring studies of the Ray Mountains and Hodzana Hills caribou did not document exchange between the two herds but did document that the herds had a strong fidelity to their respective home ranges (Horne et al. 2014). Dall sheep radio-collaring studies conducted in Unit 24A showed strong fidelity to home ranges as well (Brainerd, 2014). Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. Designation of this area as an ACEC is not justified and therefore unnecessary, given lack of identifiable and realistic resource concerns. See also the combined comment for Spooky Valley, Ray Mountains/Tozitna River, and Upper Kanuti ACECs below.
The South Fork Koyukuk River ACEC is identified as a ROW avoidance area; however, it is transected by the Bettles Road. High use in this crossing does not justify the need for special management, which is required for ACEC designation. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area; therefore, designation of this area as an ACEC is unnecessary.
No wildlife concerns have been identified for the Sulukna River ACEC. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The remoteness of this area is self-regulating and does not justify the need for special management, which is required for ACEC designation. For years 2012 through 2016, an average of 20 hunters have harvested 13 moose annually in the entire Upper Nowitna Drainage, including the Sulukna drainage. This level of moose harvest is well below the limits for sustainable harvest. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and therefore unnecessary.
The Upper Teedriinjik (Chandalar) ACEC ROW avoidance area conflicts with RS2477 winter routes to state lands. In the original ACEC Report (Table 3), BLM found that this proposed ACEC met fisheries/riparian criteria but did not meet the wildlife criteria. We concur with that conclusion and question whether the inclusion for wildlife values is an error. If intentional, we request BLM provide new information and the relevance and importance analysis that supports its inclusion. If not, designation of this area as an ACEC for wildlife values is not justified and therefore unnecessary.
The Indian River ACEC ROW avoidance area conflicts with RS2477 winter routes and should not be included as special management.
Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the proposed Hogatza River Tributary/Indian River ACECs; therefore, there is no need to designate the areas as ACECs. Hunter use patterns are very low. Since the DM889 permit hunt was established in 2004, an average of 52 permits were issued annually. An average of 51% of permittees did not hunt, and an average of 11 moose were harvested annually over the 12-year period. An average of 29 hunters harvested 6 moose annually on the RM834 permit in Unit 24C and 24D.

Table B-1
Alternatives

The Jim River ACEC avoidance area contains the Bettles Road, and under Alternative B, the popular camp sites and roads near Jim River would be unnecessarily closed to summer travel as well as the Gobblers Knob to Prospect Creek gravel road. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and is therefore, unnecessary.
Alatna River ACEC. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The Alatna River ACEC conflicts with an RS2477 winter route. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and is therefore unnecessary.
Lake Todatonten Pingos RNA/ACEC. The remoteness of this area is self-regulating. In addition, existing environmental laws and regulatory authorities would mitigate resource impacts to soil, water and vegetation, absent a designation. Given the lack of identifiable and realistic resource concerns, it appears this ACEC is not justified and therefore unnecessary.
Most hunters in the DHCMA are traveling by foot due to the Alaska State Statute's restrictions on motorized use and hunting regulations; therefore, foot traffic impacts to habitat are limited. High use during a short time-period in these areas does not justify the need for special management, which is required for ACEC designation. Archery only regulations within the DHCMA already limit hunting activity.
Galbraith Lake ACEC. While Dall sheep do use small portions of Galbraith Lake for lambing and spring foraging, we do not consider this to be critical habitat. According to the 2009 BLM report "Dall Sheep Use of ACECs in the Utility Corridor Management Area, Alaska," the previously identified mineral lick did not have signs of recent use, and no other mineral licks were identified. The Utility Corridor RMP noted "This area is currently withdrawn from mineral location and entry as part of the inner Corridor. No mineral withdrawal specific to mineral licks is necessary at this time." Both Alternative B and C now recommend withdrawal from locatable minerals for the entire ACEC as well as any mineral licks. There appears to no wildlife-related need for this ACEC or the associated proposed withdrawal as special management.
Toolik Lake RNA. The special status species cited by BLM for this RNA are plant species, not fish or wildlife species. For clarity, we recommend specifying "special status plant species." Toolik Lake serves as a floatplane takeoff for the public, including hunters and anglers. In the absence of resource concerns, we support continued public access and use within the RNA.
Midnight Dome ACEC contains Nolan Road and Hammond River Road. It is inappropriate to close these roads in the summer as proposed in Alternative B. We do not support applying this management prescription to any alternative.
The Poss Mountain ACEC area currently provides the only summer overland access to state lands east of the Dalton Highway in T. 31 N., R. 9 W., Fairbanks Meridian. We request that this area remain open to OHV in the summer. Very few sheep inhabit Poss Mountain.
The Jim River and Midnight Dome/Kalhabuk ACECs contain gravel road networks with sustainable road surfaces that need to be excluded from the summer road closure proposed under Alternative B. In addition, the OHV trails along Gold Creek in the Poss Mountain ACEC also need to be excluded from the summer use closure as they provide the only overland access to state lands within T. 31 N., R. 9 W., Fairbanks Meridian.

Table B-1
Alternatives

The PAC does not provide justification for the proposed summer OHV limits in the Galena Mountain Caribou ACEC. We therefore request an opportunity to discuss BLM's concerns and options for special management for this ACEC.
The terms "priority species habitat" and "priority watersheds" are used in the ACEC section without explanation. We therefore request an opportunity to discuss these concepts with BLM during the development of the draft plan.
Page 16-24, Section 3.4, ACECs: We suggest the list of ACECs be alphabetized for easier reference.
We strongly encourage creation of specific ACES's, including the "Jim River" ACEC. In fact, expanding this ACEC to the north along its northwest edge to abut NPS lands in GAAR would promote ecological connectivity between conservation units (GAAR NPS lands, BLM ACEC, Kanuti NWR). It would also provide means to control use along proposed Ambler Road corridor, which would cross these lands. It is good to see this area recommend for withdrawal from locatable mineral entry in Alternative B.
Expanding Nugget Creek and Midnight ACECs towards one another in the "comer" of BLM land that abuts GAAR would be a good idea, but that covers a pretty solid block of existing mining claims. It appears to be covered as "high value watershed" in Alternative B but it's unclear what that means for OHV use, etc. in the area. We suggest the addition of the Midnight Dome ACEC to the list to retain or expand ACECs, and include something about having limited summer (May-June in particular) OHV use for all of those on the east side of GAAR - only some have that restriction.
Retain (or expand) Galbraith Lake, West Fork Atigun River, Snowden Mtn, Sukakpak, Nugget Creek, Poss Mtn, and Nigu-Iteriak ACECs.
We agree with the goal: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities" (p13). We believe that for BLM to be able to achieve the above goal/objective, strong consideration should be given to expanding the boundaries of the Upper Kanuti River Area of Critical Environmental Concern (ACEC), and Ray Mountains/Tozitna River ACEC. If these ACECs cannot be expanded, then BLM should establish two special watershed management areas that: (a) include the entire Kanuti River drainage on BLM lands; and, (b) connects the Ray Mountains/Tozitna River ACEC with the Kanuti NWR boundary and includes the greater Kanuti Kilolitna River drainage, as depicted in the Refuge's first proposed "Kanuti Kilolitna River ACEC." To avoid serious impacts to the fish, wildlife, and habitat resources of Kanuti NWR downstream of BLM lands we urge you to provide the same level of careful upstream watershed management on the Kanuti and Kilolitna Rivers as will be given to the South Fork and Jim Rivers in Alternatives B and C of the preliminary concept document.

Table B-1
Alternatives

Our three main points above would seem to justify that BLM carefully manage the entire Kanuti River and Kilolitna River watersheds upstream from the Kanuti NWR boundary. Withdrawal of lands from mineral entry would be our first preference for protection of these two important habitat areas upstream from Kanuti NWR. if expansion of these two ACECs is deemed not politically feasible, then we recommend designation of two special watershed management areas to be given priority attention any time that permitting decisions are made. For example, instead of stating in a general way that BLM will apply "best management practices" to mineral permitting actions, we would urge the BLM to allow only "state-of-the-art closed systems that discharge zero effluent into watersheds in all areas upstream of CSUs." This has been successfully demonstrated by the award-winning Nyac Mining Co. at Squaw Creek in the Chandalar River drainage, and elsewhere in Alaska.
By adding the watershed and land connectivity measures we recommend for the original Kanuti River- and Kilolitna River-nominated ACEC areas, a small amount of BLM land area becomes additive to FWS lands in order to realize a huge conservation impact. In such a manner BLM can allocate a smaller amount of their own lands for conservation purposes and yet have a disproportionately large conservation impact by combining with the adjacent CSUs.
In summary, we ask that BLM either (a) increase the extent of the currently proposed Upper Kanuti River and Ray Mountains/Tozitna River ACECs to include the entire watershed from the headwaters downstream to the Kanuti NWR boundary, or, (b) create two special watershed management zones for the entire Kanuti and Kilolitna watersheds within BLM management that will employ the most stringent permitting procedures and that these will be disclosed and vetted to the public. The draft EIS should include an appendix with specific mineral permitting guidance in the form of Standard Operating Procedures and Policies and/or Instructional Memoranda that would also be publicly reviewed as part of this planning process.
From the overview: ACECs are areas on public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards... Under all action alternatives, caribou, moose, Dall sheep, crucial beaver habitat are identified as priority species habitat. Priority watersheds have also been identified for important fisheries. As described under section 3.2, we believe there is reason to protect both the Kobuk River and Selawik River watersheds for their critically important fisheries values. The Selawik River in particular is a rich watershed and a Wild and Scenic River corridor.
We believe that all habitat used by the Western Arctic Caribou Herd should be given priority protection based on long-term range maps in the Western Arctic Caribou Herd Cooperative Management Plan (Western Arctic Caribou Herd Working Group 2011).
Additionally, the Pah River and Pah River flats are areas of cultural importance for the upper Kobuk inupiat with many old sites and stories (Magdanz 2007). We believe that these cultural values, along with the rich habitat for birds, fish, and small mammals, justify its possible protection within an ACEC. The Pah River is directly upstream of the Kobuk River sheefish spawning area, and the Pah is also likely a spawning area for humpback whitefish and other fish species. These considerations should weigh in any permitting decisions or the designation of an Ambler Road right-of-way by the CYRMP.

Table B-1
Alternatives

We appreciate the opportunity to provide comment on the preliminary alternatives concepts for the Central Yukon Resource Management Plan. We have reviewed the planning matrix, maps and related documents carefully, and offer the following comment in reference to Alternative Concept 3.4 - ACECs. We agree with the goal: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities" (p13).
We request clarification why 26,800 acres of the upper Sagavanirktok River was excluded from the Accomplishment Creek ACEC designation. The explanation provided by the BLM is that areas within the Service's nomination that meet the criteria for the Soil, Water, and Fish categories are included in the Accomplishment Creek nomination. However, there are wildlife and scenic values, and additional riparian values in the Sagavanirktok River itself that are not contained in the Accomplishment Creek ACEC, notably: Dall sheep lambing habitat and the recreational and water quality values of the main stem of the Sagavanirktok River. Furthermore, this area has been documented as a migration corridor for the Central Arctic Caribou Herd (Nicholson et al. 2016, PLoS ONE 1 1(4):e0150333), which likely contributes to the popularity of this area for recreational and subsistence hunting (few other areas are as easily accessible to hunters without aircraft transportation). The herd has recently undergone a significant decline, prompting the Alaska Department of Fish and Game to take measures to reduce the harvest of this herd. The justification submitted by the Service in the original proposal is still valid; this is an important area for Dall sheep habitat, wildlife viewing, caribou hunting, fishing, and other wildlife-related recreation. The Service recommends that the western boundary of the Accomplishment Creek ACEC be moved westward to be contiguous with the eastern boundary of the Toolik RNA so as to include all areas of high scenic, wildlife, and aquatic values. If this change is not made, then we recommend that other measures, such as stringent permitting requirements, be taken to maintain the value of this area for caribou migration, Dall's sheep lambing range, and human recreation.
We support the full extent of the BLM-nominated ACECs in watersheds that feed Koyukuk NWR: Hogatza, Klikhtentotzna Creek, North fork of the Huslia River (Billy Hawk) and Wheeler Creek. The added permitting scrutiny that an ACEC may afford is needed so that Koyukuk NWR may be able to fulfil its ANILCA purposes. We also believe the Galena Mtn. Caribou Herd ACEC is important to a small montane herd that we share between BLM and FWS lands. FWS provides special management on our lands for that herd (e.g. lichen protection zone).
Alternatives – Recreation Management Areas
Alternative A
No comments.
Alternative B
The Special Recreation Management Areas (SRMA's) as designated in Alternative B are good.
The Dalton Highway provides access to America's arctic landscapes. We strongly support management for recreation that supports diverse needs in the backcountry and front country. Therefore we support the use of three separate units to maintain these user needs.

Table B-1
Alternatives

We are in strong support for the Koyukuk SRMA Middle Country designation for lands adjoining GAAR along the Dalton Highway in Alternative B.
Alternative C
No comments.
Alternative D
No comments.
New Alternative
…providing perspective as hunter who uses public land, the Dalton highway use as a blow hunter. Larry presents video and other hunter education materials regarding recreational hunting issues along the Dalton corridor. There is a need for more hunter education about ethics for those using the Dalton corridor. There is also not enough law enforcement available to address the concerns that I have document over the years. Other lands closed in the western portion of the planning area will put more pressure on the Dalton corridor. This concerns me because BLM is not prepared for this. Poop piles, toilet paper, fire rings, trash left in fire rings and human impacts are an issue. 1 in 4 people who salvage a big animal does a poor job.
Alt A is the best, Alt B and C allow access to right next to the highway. This highway is one of the only places in Alaska to experience wilderness without flying out. People can ski right off the highway. Once those lands are opened up to ATVs and motorized access, the whole character will change. It will take away from Alaskans to recreate in a wilderness setting without paying a lot of money to fly out. Additionally, more access and motors will disrupt animal viewing. Visitors come to see wildlife. For Alaskan residents more value in tourists to see animals.
Are the numbers of recreation management areas sufficient for current and future use? The area should continue to be managed as ONE management area, with focus on the protection and enhancement of habitat, fish, wildlife, water, and wilderness resources that currently exist there and that provide world-class backcountry recreational opportunities that rarely exist elsewhere along a public road. Breaking the area up into multiple management areas is confusing and creates winners (OHV users, miners, mega-corporations) and losers (current users, namely Alaskan and American hunters, fishers, campers, hikers, floaters, subsistence users, etc.).
Allowing for motorized recreation in the planning area would lead to similar situations where current user groups would lose access to the resources we currently value and depend upon. All policy and plans in the planning area should emphasize non-motorized recreation.
BLM could best facilitate recreation by keeping and strengthening current regulations that prohibit OHV use by non-locals, by keeping and strengthening regulations again mineral exploration and extraction, and by potentially improving obvious access points such as boat launches and pull-outs to allow for safer use of these resources by current users.
Under the current management regime, I rarely see user conflicts. Sure, on occasion I run into fellow-backcountry hunters and anglers, but these are rarely conflicts. The lack of current conflict is a strong testament to the current management regime and strongly argues that it should remain as one management area, unchanged. Don't fix it if it isn't broken. And the planning area currently isn't broken and recreational use conflicts are extremely low. Breaking the area up into multiple recreation planning areas would increase conflict and again, make winners and losers.

Table B-1
Alternatives

Combination of Alternatives
The ERMAs, it seems to me that those are different from SRMA because they recognize that recreation that recreation goes on in these areas. The Nigu caught my eye because there are not many people up there but this is a mechanism by which BLM can recognize that these are recreational areas. So, in my mind anyway, it's better to have an ERMA than nothing. I like that. It's a very good thing.
I like the range of alternatives. I would like to see more of a blend of B and C. The Nigu River area is very popular area and I believe it should be carried forward in Alt C. From my studies, the Nigu River receives about 25% less use than the Atigun Gorge. Both are high concentration areas and the two most popular backcountry access for BLM managed lands.
Hunting restrictions should remain the same as they are now for the entire corridor.
The Nigu/Iteriak River ERMA should be added to Alternative B & be retained in Alternative C. This area is heavily used for such a remote area & deserves special attention. It should be enlarged to include at least all of the land up to the boundary of the Noatak National Preserve, Gates of the Arctic National Park & the NPRA. It should extend all the way north to the northwest corner of the Gates of the Arctic National Park & include all the BLM lands in this area. This is a very special area and should be managed as wilderness.
The ability of paddlers to be able to paddle all the way to the Etlivik, uninterrupted is very important.
I would like to see some kind of better facility at the South Fork of the Koyukuk River crossing. This is a very popular area, especially for boat launching. It gets trashed out easily. Something that can withstand the impact & keep people from driving all over the place. Semi-primitive camping & better parking facilities should be provided.
Alternative Concept 3.5 – Recreation Management Areas "To promote positive recreational experiences, encourage sustainable travel and tourism development and provide community-based conservation support for visitor services, by developing educational programs and literature, in partnership with native, local, state, private, not-for-profit, volunteers, special interests, and federal partners" (p25). The Refuge Association and Friends support this objective but would expand it to include: 1) Identifying specific measures to maintain high-quality viewsheds throughout the exceptionally beautiful recreational sections of the Dalton Highway, and, 2) Developing key interpretive messaging along the Dalton where visitors and locals alike can find meaning from little-known geographical, wildlife, geological, cultural, historic and other waypoints, e.g., views into the famed Arctic National Wildlife Refuge, and the lesser-known Yukon Flats and Kanuti National Wildlife Refuges. Key waypoints e.g. Finger Mountain, Kanuti Crossing, Fish Creek Crossing, Bonanza Creek Crossing, Gobbler's Knob, Jim River Crossings, Grayling Lake, South Fork Crossing, Atigun River access to Arctic National Wildlife Refuge, and the historic village of Wiseman made famous in Bob Marshall's Arctic Village readily lend themselves to interpretation. Likewise, these extraordinary viewsheds should be protected by sensitive techniques, e.g. underground utilities and power lines and stringent mineral/transportation permitting.

Table B-1
Alternatives

It is important that access to and from airports are not affected by ROW exclusions areas, as well as ACECs, SRMAs, ERMAs. The following is a list of airports and M&O camps located along the Dalton corridor, which need to be recognized and identified throughout the draft plan and on all maps.

Airports

- Deadhorse
- Galbrath Lake
- Chandalar Lake
- Wiseman
- Coldfoot
- Prospect Creek
- Livengood Camp

M&O Camps

- Deadhorse
- Sag River
- Chandelar
- Coldfoot
- Jim River
- Seven Mile
- Livengood
- Manley Hot Springs

SRMA designations and BLM's accompanying requirement to incorporate Benefits Based Management are not a good fit in the corridor, and possibly elsewhere outside the corridor where both recreational and subsistence uses occur.

The PAC provides no explanation for why the corridor, which is currently managed as one SRMA, needs to broken up into 3-9 separate SRMAs, depending on alternative.

Rather than designating "Recreation Management Areas" (SRMAs and ERMAs), we request the plan take a more general approach to facilitate recreation and other public uses.

We recommend the plan include "meeting public needs for fish and wildlife related access" as a goal or objective. Examples of specific projects that could be pursued in support of this plan goal or objective without encroaching on State fish and wildlife management responsibilities include providing bathrooms, boat ramps, and parking facilities.

Page 25, Section 3.5, Recreation Management Areas, Objectives, first bullet: We request the plan clarify the first bullet. Specifically, explain what is meant by a comprehensive approach to recreation planning and identify the recreational activities that this would apply to.

The document does not show future campgrounds or visitor use areas. Will BLM propose additional visitor use areas within the SRMA's/ERMA's or any other portions of the BLM managed lands?

Table B-1
Alternatives

We agree with the objective: "To promote positive recreational experiences, encourage sustainable travel and tourism development and provide community-based conservation support for visitor services, by developing educational programs and literature, in partnership with native, local, state, private, not-for-profit, volunteers, special interests, and federal partners" (p25). We suggest adding a goal aimed at maintenance of high-quality viewsheds and intact visual resources along the most important recreational sections of the Dalton Highway. Specific valuable scenic recreational areas that the Kanuti NWR staff is familiar with include: Finger Mountain, Kanuti River Crossing, Fish Creek Crossing, Bonanza Creek Crossing, Gobbler's Knob, Jim River Crossings, Grayling Lake, and South Fork Koyukuk River Crossing.
Another important aspect of recreational use along the Dalton Highway is the interdependence of and connection between the BLM- and FWS-managed lands. Recreationists, such as hunters, anglers, or river floaters, frequently start their trip into remote areas by benefitting from the convenient and economical access afforded by the Dalton Highway. Each year the Kanuti NWR staff is aware of several float trips or river-boat trips that begin on BLM lands along the Dalton and include recreating on Kanuti NWR. FWS recommends that the recreational interconnectedness of FWS and BLM lands be recognized and managed for continued high quality, wilderness-like recreational opportunities.
A unique public use of BLM-managed lands near the Selawik Refuge is a winter travel route between the villages of Huslia and Shungnak via the Selawik Hot Springs, located near the eastern boundary of the refuge. This winter trail is used by local people accessing the hot springs for recreation and healing (USFWS 2011), and also by long-distance travelers moving between the winter trail systems of the Northwest Arctic and Interior regions. The trail Shungnak-Selawik Hot Springs-Huslia trail is the only staked route linking these two regions. We recommend that BLM plan for the continuation, and when necessary the management or improvement, of this historical and current travel route.
Staff at Koyukuk NWR are aware of the strong recreational potential of the Hogatza, Dulbi, and Melozitna watersheds. Refuge staff a have observed recreational use, particularly floating these rivers for moose hunting and sport fishing. BLM should recognize these specific values in the RMP.
Staff at Nowitna NWR must emphasize strong recreational importance of the Nowitna Wild River. The overall health and aesthetics of this Wild River depend in part on its major tributaries that flow out of BLM lands. The Titna, Telsitna, Sulukna, Sethkona, and Lost Rivers, and Our Creek, Flint Creek, all feed the Nowitna, and are important to recreation because they support the Nowitna Wild River. Refuge staff has observed increasing recreational use, particularly floating these rivers for moose hunting and sport fishing. The mouths of some of these rivers are important sheefish angling spots. BLM should recognize these specific values in the RMP.
Alternatives – Off-Highway Vehicle (OHV) and Travel Management
Alternative A
No comments.
Alternative B
The concept of maintenance and improvement of land health, and the promotion of responsible use through active Travel Management Areas is an excellent one.
Alternative C
No comments.

Table B-1
Alternatives

Alternative D
No comments.
New Alternative
Prohibit ORVs.
Also oppose the Doyon winter trail permit into the Yukon Flats.
Also looking at the corridor, I think that OHV use should not be allowed and be completely controlled with the exception of subsistence travel.
Concerns about winter time access for recreational travelers. There is not enough space to pull off the road and it is becoming a safety concern. Need to consider larger winter pull offs.
…just north of Coldfoot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
Keep all access open.
Combination of Alternatives
I certainly would echo previous comments about keeping OHV vehicle use restrictive rather than open it up.
Concern about opening the haul road for liberalized access, motorized use and increased big game hunting.
The Bettles Winter Road Corridor should be open to the public including snowmobile traffic.
The winter trail up Slate Creek into the Chandalar Lake Mining District should be open to the public, including snowmobiles.
The road to Nolan & the Hammond River should be open to the public & open to snowmobile use on the roadway.
Public access up Gold Creek & Bettles River including snowmobiles should be allowed.
Public access including snowmobile use from Chandalar Shelf down the North Fork of the Chandalar should be allowed.
Is there any place to launch a boat on the Middle Fork of the Koyukuk River? I understand there is a road ROW to Chapman Bar. But I also understand this is available only for private miner use. Was this road built with public funds? Why is it not available for public use? Or is it? Is there a better place for public river access to the Middle Fork of the Koyukuk?
I am also not sure what is available to access the upper North Fork of the Chandalar River from Chandalar Shelf? Disposing of much land in this area to the State of Alaska could block public access to this river.

Table B-1
Alternatives

The winter restriction of snowmobiles on the first five miles of the Bettles Road is ridiculous.
BLM needs to inventory all ROW's within the corridor & determine which of these should also be open to the public.
Otherwise I support the restrictions on unlimited snowmobile & OHV use within the corridor.
Careful consideration of non or low impact travel corridors are essential for minimal impact for the environment. Keeping plant health in a continuous area undisturbed. Keeping herds undisturbed.
We'd like to see the non-motorized rule remain in place for the entirety of this corridor. However, we recommend winter OHV use only, with snow-depth restrictions to protect sensitive habitat and careful management to monitor for non-native invasive vegetation.
The non-motorized rule has worked well to reduce user conflicts among all hunting groups, and it should remain.
In developing the RMP, BLM should specifically address the access guaranteed to Doyon and other inholders under Section 1323(b). The RMP must be consistent with meeting the future access needs of Doyon and other inholders within the planning area—including, but not limited to, access to and from the Dalton Utility Corridor—as guaranteed under this provision and under the Title XI provisions discussed above.
Doyon emphasizes that, consistent with one of BLM's stated objectives, that the Utility Corridor must "continue to support existing and future anticipated transportation and utility projects."
Access must be preserved and provided to Doyon lands in the vicinity of Sithylemenkat Lake, Stevens Village, Rampart, and other lands, for natural resource development and other purposes, including overland village access. There are significant mineral and oil and gas prospects within 20 to 40 miles of the Utility Corridor that will require access to and from the Corridor.
The final plan should not take or recommend any action that could impose new limitations on access to, or use of, Doyon lands.
Accordingly, the RMP must appropriately address Doyon's and other inholders' rights to access pursuant to Title XI and Section 1323(b) of ANILCA-not just in the plan itself, but ensuring that the plan's implementation will not create roadblocks to such access.
The final plan should provide reasonable clarity and certainty for those who own inholdings within the boundaries of the planning area, who require access across federal lands in the planning area in order to access those inholdings
My preferences for OHV uses are for protection for ground cover. In summer and when there is limited freeze and snow depth.
Subsistence access use with snowmobile must be retained in the RMP in the Dalton Utility Corridor, as stated in ANILCA statute and in the Federal Subsistence regulations.
Exceptional view sheds along the Dalton Highway should be protected with rigid mineral and transportation permitting.

Table B-1
Alternatives

Alternative B, page 10, and Alternative C, page 9, South Fork Koyukuk River ACEC and Upper Teedriinjik (Chandalar) River ACEC: RS2477 routes currently provide the only existing overland access to isolated tracts of state land. We request that use of these routes be recognized and retained in the plan.
Alternative B, page 10, and Alternative C, page 9, Alternatives B and C, page 20: The South Fork Koyukuk River ACEC and Jim River ACEC contain the eastern most portions of the Bettles Road and we request that the use of this road be recognized and retained in the plan.
The alternatives in the PAC make no distinction between subsistence and non-subsistence OHV use. The plan needs to clearly state which OHV and travel management decisions apply to federally qualified subsistence users, and explain that any restrictions to subsistence access will be implemented through the ANILCA Section 811 regulatory closure process identified for the EIRMP.
Where OHV use is currently allowed (i.e. outside of the Dalton corridor), we request that BLM manage OHVs to facilitate access while conserving riparian and wetland resources. We request BLM provide site-specific justification for proposed restrictions to OHV use. Concern that use may increase in the future is insufficient.
We request the plan clarify whether OHV limits apply to summer use. We also request the plan identify the size of the affected areas.
We recommend BLM clearly identify the necessity for riparian and water-body resource protections, limit protective measures only to those areas that are necessary, and ensure protective measure are practical in the sense that they can be identified on-the-ground.
The Jim River and Midnight Dome/Kalhabuk ACECs contain gravel road networks with sustainable road surfaces that need to be excluded from the summer road closure proposed under Alternative B. In addition, the OHV trails along Gold Creek in the Poss Mountain ACEC also need to be excluded from the summer use closure as they provide the only overland access to state lands within T. 31 N., R. 9 W., Fairbanks Meridian.
The PAC proposes to restrict aircraft landings in the Spooky Valley, Upper Kanuti, Jim River, or Ray Mountains areas. We are not aware of any related resource concerns; therefore, do not support closures that would unnecessarily restrict access to these areas.
The PAC does not provide justification for the proposed summer OHV limits in the Galena Mountain Caribou ACEC. We therefore request an opportunity to discuss BLM's concerns and options for special management for this ACEC.
We strongly recommend prohibition of non-subsistence OHV (4-wheeler or snowmachine) use off the Dalton corridor and spur routes for a variety of reasons. Subsistence users in the upper Kobuk (outside the affected area) do not support catch and release fishing. We suspect this opinion is more widespread and affects subsistence users in more remote drainage's in the Yukon River Basin (e.g., upper Koyukuk). Here is the URL for the document: https://pdfs.semanticscholar.org/695f/8b2295e414f6f7077b5703247de81 f131 a46.pdf.
Two locations requiring particularly careful consideration of OHV access rules are the Alatna River and South Fork Koyukuk River areas because the proposed Ambler Road could dramatically improve access to them.

Table B-1
Alternatives

The draft alternatives show less restricted drone uses under alternates B, C and D. We suggest there should be more testing of drone impacts to wildlife, particularly at licks, before allowing non-administrative use of drones.
Soil composition, permafrost characteristics, and ice content data should ideally be used to help determine where OHV traffic and ROW's are allowed. New permafrost maps by Jorgenson and ice-content maps could be used to help identify where sensitive soils exist throughout the region. High ice-content regions should be identified and protected as ACEC's.
BLM efforts to maintain connectivity corridors should include consolidation of federal ownership, right-of-way exclusion areas, careful design of wildlife crossings and fish passages, locatable mineral entry withdrawals, and/or stringent permitting.
A unique public use of BLM-managed lands near the Selawik Refuge is a winter travel route between the villages of Huslia and Shungnak via the Selawik Hot Springs, located near the eastern boundary of the refuge. This winter trail is used by local people accessing the hot springs for recreation and healing (USFWS 2011), and also by long-distance travelers moving between the winter trail systems of the Northwest Arctic and Interior regions. The trail Shungnak-Selawik Hot Springs-Huslia trail is the only staked route linking these two regions. We recommend that BLM plan for the continuation, and when necessary the management or improvement, of this historical and current travel route.
New Alternatives Ideas
Alternatives – Coal
Unleased coal lands should be reviewed for further potential leasing and development.
Alternatives – Leasables
Areas currently closed for oil, gas, tar sands, and geothermal resources, should be reviewed and updated for potential leasing.
General questions about what minerals are available- specifically oil and gas.
Alternatives – Mineral Materials
Increased mineral materials (sand and gravel) need to be located and developed, due to needs associated with maintenance of the Dalton Highway, the Trans-Alaska Pipeline System ("TAPS"}, and the expected future construction of a gas pipeline.
Alternatives – Wild and Scenic Rivers
Accordingly, we recommend that rivers flowing through public lands in the Planning Area be studied and the findings included in the action alternatives in the Draft Central Yukon Resource Management Plan/EIS.
BLM should consider that NWSR recommendation and designation imposes significant restrictions on the use of, and access to, surrounding lands. Recommendation and designation of additional river segments reviewed in connection with this planning effort could prevent Doyon and other ANCSA landowners from reasonably accessing their lands and enjoying the full economic benefit of those lands as intended by ANCSA.

Table B-1
Alternatives

We also reiterate the State's strong objection to a wild and scenic river study and remain opposed to any recommendations for additional wild and scenic river designations on BLM lands as the study is in direct conflict with Section 1326(b) of ANILCA. We also object to considering rivers as suitable, even if just for 14 analysis purposes (i.e., BLM Manual 6400) and applying interim management that would be inconsistent with ANILCA for a designated river.
Alternatives – High Value Watersheds
It is difficult to evaluate the relevance of the restrictions for the high value watersheds with the small-scale maps provided. There is also no estimate of the total size of the affected areas nor information that explains why particular watersheds are considered high value, other than a general statement that equates high value watersheds with high value fisheries. High value fisheries are also not described. We request BLM address these issues as the alternatives are further developed, as well as identify reasons why management action is considered necessary given the extensive federal and state regulatory authorities that already apply to waterbodies, absent a special designation.
We agree with the goal: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities" (p13). We believe that for BLM to be able to achieve the above goal/objective, strong consideration should be given to expanding the boundaries of the Upper Kanuti River Area of Critical Environmental Concern (ACEC), and Ray Mountains/Tozitna River ACEC. If these ACECs cannot be expanded, then BLM should establish two special watershed management areas that: (a) include the entire Kanuti River drainage on BLM lands; and, (b) connects the Ray Mountains/Tozitna River ACEC with the Kanuti NWR boundary and includes the greater Kanuti Kilolitna River drainage, as depicted in the Refuge's first proposed "Kanuti Kilolitna River ACEC." To avoid serious impacts to the fish, wildlife, and habitat resources of Kanuti NWR downstream of BLM lands we urge you to provide the same level of careful upstream watershed management on the Kanuti and Kilolitna Rivers as will be given to the South Fork and Jim Rivers in Alternatives B and C of the preliminary concept document. Our three justifications follow.
We consider the entire Kanuti River drainage, including the Kilolitna, to be a "high value" watershed because of fisheries productivity, subsistence, and recreational values. Therefore, when making land-use planning decisions on the areas upstream of Kanuti NWR, we urge BLM to consider a larger, more holistic scope than is indicated by current analyses. We are aware that BLM's determination of a watershed's fisheries "value" was based solely upon the lands and waters within BLM jurisdiction. However, we ask for reconsideration. We ask that BLM approach this decision on a landscape-wide and watershed-wide scale. We ask that BLM recognize the importance of water quality and quantity maintenance on BLM-managed watersheds that flow downstream to adjacent Kanuti NWR lands and watersheds. BLM and FWS need to work more closely to guarantee the continuation of healthy spawning, rearing, and over-wintering fish habitats in the Kanuti and Kilolitna River watersheds.

Table B-1
Alternatives

We believe BLM should consider the entire Kanuti drainage to be a "high value" watershed. Similarly, in the Ishtalitna Creek/Ray Mountains/Tozitna area, we recommend that BLM consider the entire Kilolitna River watershed as "high value." We recommend that the Central Yukon RMP describe the specific means BLM will use to guarantee no diminishment of water quality and quantity due to BLM permitting actions in the upstream areas that feed Kanuti NWR via the Kanuti and Kilolitna Rivers. This is of critical importance in order to continue to support the whitefish and salmon populations of the Kanuti Refuge. In the village of Hughes, Wilson and Kostick (2014) determined that a majority of subsistence resources harvested by weight was fish, a pattern that has continued since 1982, albeit at lesser amounts recently. Similarly, recent ADFG Subsistence studies clearly document the continued reliance by the people of Allakaket and Alatna on the fish resources of the Kanuti NWR region (Holen et al. 2012; also see recent data for Allakaket to be provided to BLM by Dr. Annette Watson, 2016).
Our three main points above would seem to justify that BLM carefully manage the entire Kanuti River and Kilolitna River watersheds upstream from the Kanuti NWR boundary. Withdrawal of lands from mineral entry would be our first preference for protection of these two important habitat areas upstream from Kanuti NWR. if expansion of these two ACECs is deemed not politically feasible, then we recommend designation of two special watershed management areas to be given priority attention any time that permitting decisions are made. For example, instead of stating in a general way that BLM will apply "best management practices" to mineral permitting actions, we would urge the BLM to allow only "state-of-the-art closed systems that discharge zero effluent into watersheds in all areas upstream of CSUs." This has been successfully demonstrated by the award-winning Nyac Mining Co. at Squaw Creek in the Chandalar River drainage, and elsewhere in Alaska.
In summary, we ask that BLM either (a) increase the extent of the currently proposed Upper Kanuti River and Ray Mountains/Tozitna River ACECs to include the entire watershed from the headwaters downstream to the Kanuti NWR boundary, or, (b) create two special watershed management zones for the entire Kanuti and Kilolitna watersheds within BLM management that will employ the most stringent permitting procedures and that these will be disclosed and vetted to the public. The draft EIS should include an appendix with specific mineral permitting guidance in the form of Standard Operating Procedures and Policies and/or Instructional Memoranda that would also be publicly reviewed as part of this planning process.
Alternatives – Mineral Licks
We request BLM explain the specific management concerns regarding mineral licks and how the proposed restrictions will address these concerns. Most human use near mineral licks primarily occurs Aug 1– Sept 20 during the general Dall sheep hunting seasons. Human disturbance likely has little biological effect on sheep during the fall, because adults are in prime condition and lambs are fully mobile. Like other big game hunting seasons that occur during the fall, hunter disturbance to sheep during fall in general and specifically near sheep mineral licks has little or no biological impacts, and sheep are the least vulnerable to disturbance during that time of year. To support restrictions related to mineral licks that affect hunter access, BLM needs to demonstrate that sheep are being significantly affected by low elevation disturbance to mineral licks from hunters during that period (B. Wendling, ADF&G-sheep researcher-personal communication).
Alternatives – Climate Change
We do not see sufficient provisions in your plan alternatives to provide for climate change adaptation and resiliency.

Table B-1
Alternatives

BLM should include policy that recognizes the Brooks Range and Arctic coastal plains are experiencing a big thaw accompanied by warmer climate trends and shorter freeze periods, not to forget increased human use, and should explicitly address how climate change is likely to exacerbate impacts of some potential activities (i.e., melting, slumping, erosion from recreational and industrial trails and roads.)
Alternatives – Cultural Resources
We'd like to see an Alternative that protects the sanctity of all paleoancestral sites within the proposed land exchange areas.
Instead of identifying these sites and developing land decisions around some of them, we urge the BLM to champion a vast BCA that ensures protection of our lands with cultural resources so that primitive artifacts may be found by future generations.

Table B-2
Support for Alternatives

Alternative A
All of the BLM managed lands (yellow) should never be influenced negatively for subsistence uses (anything of harvest of the resources- not commercial); all of the yellow is important and potentially usable by the people. Preferred no improvements to individual transportation.
3.1 Locatable Minerals Line 1; Opt. A, Line 2; Opt A, Line 3; Opt. A with some of the ACEC's included from Opt. B
Dalton Utility Corridor (PLO 5150); Line 2; Opt. A, Line 3; Opt. A,
3.4 Areas of Critical Environmental Concern (ACECs) Line 1; Opt. B Line 2; Opt. B Line 7; Opt. B Line 14; Opt. A Line 15; Opt. C Line 16; Opt. C Line 17; Opt. B or C Line 18; Opt. A Line 20; Opt A
3.6 Off-Highway Vehicle (OHV) and Travel Management Line(s); Opt A
Alternative B
Support alternative B and the most protective environmental provisions.
Alternative B is my choice.
We support Alternative B, emphasizing protection of resource values.
I don't know how long development will provide jobs. However, I do know the land will continue to provide subsistence if given space. I recommend alternative B to help this.
3.1 line 2. I prefer Alternative A and B. No lifting of the PLO 5150.
Lines 11,12, 13 and 14. I prefer Alternative B watershed protections.

Table B-2
Support for Alternatives

Line 16. Alternative B would be preferred. Additional protection needed for this ACEC. The Gold Creek low elevation sheep lick is an area that should have access routes that do not impede sheep movements. The most intensive sheep activity is in August through October when sheep are prone to use this lick. The route up Gold creek bed should be closed to miners travel in late summer/fall. Winter freighting up Gold Creek would not affect sheep when they are in the alpine. The access route ½ mile to the north is best in the summer with light OHV. All large equipment and bulk supply should be moved in late winter.
Recreation Management Areas Line 1. Alternative B is my preference. Three separate congruous geographic SRMA areas are better administrated.
Off-Highway Vehicle (OHV) and Travel Management Line 1. Alternative B, C & D preferred. Line 2. Alternative C preferred. Line 3. Alternative C preferred.
3.2 Lands and Realty, Right-of-Way Exclusion Areas Line 1; Opt B (add BTT River to ACEC/Excluded from ROW allowance)
3.3 Lands with Wilderness Characteristics Line 1; Opt. B
3.4 Areas of Critical Environmental Concern (ACECs) Line 1; Opt. B Line 2; Opt. B Line 7; Opt. B Line 14; Opt. A Line 15; Opt. C Line 16; Opt. C Line 17; Opt. B or C Line 18; Opt. A Line 20; Opt A
3.5 Recreation Management Areas Line 1; Opt. B Line 2; Opt. C
AMA supports the statement in the overview for the Lands and Realty Section that under alternatives B, C, and D BLM will recognize the Ambler and Umiat road corridors. This provision should be included in ALL alternatives.
Alternative concept 3.2 Lands and Realty We believe Alternative B best meets the BLM goal to: Retain public lands with high resource values. Adjust land to consolidate public land holdings, acquire lands with high public resource values, and meet public and community needs.
Alternative Concept 3.3 Lands with Wilderness Characteristics We believe Alternative B best meets the BLM goal to: Manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation.

Table B-2
Support for Alternatives

Alternative Concept 3.4 ACECs We believe Alternative B best meets the BLM goal to: Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards.
Alternative Concept 3.5 Recreation Management Areas We believe Alternative B best meets the BLM goal to: To promote positive recreational experiences, encourage sustainable travel and tourism development and provide community-based conservation support for visitor services, by developing educational programs and literature, in partnership with native, local, state, private, not-for-profit, volunteers, special interests, and federal partners.
The Northern Alaska Environmental Center supports the use of OHV's for subsistence hunting and fishing and management for this use should be prioritized during appropriate times of the year. Therefore we support Alternative B.
We strongly believe the plan's theme should be similar to Alternative B and emphasize the protection of resource values. The final plan should focus on landscape connectivity to allow for wildlife movements, adaptability to climate change, and key habitat needs for focal species that have conservation and subsistence importance.
I feel Alternative B is the best one presented.
I prefer Alternative B as it emphasizes protection of resource values while allowing some mineral extraction activities and providing land along the Dalton Highway Corridor for State selection. Although I might rather see no additional development in this area, I realize compromise is necessary.
In Alternatives B and C, we agree that the range of alternatives and the relative proportions of lands to be retained in federal ownership through not lifting the Public Land Order (PLO) 5150 withdrawal seem reasonable. Alternative C allows 157,400 acres of the PLO 5150 withdrawal to be lifted, which could make these lands eligible for transfer to the State of Alaska or Alaska Native Claims Settlement Act (ANSCA) Corporations that want to fulfill their lands entitlements. We agree that more intensive development is appropriate near designated "development nodes" of the "inner corridor" and that future public services and infrastructure along the Dalton should be accommodated at these development nodes. Conversely, we also believe that there are areas that must remain in the federal estate because they are immediately adjacent to federal Conservation System Units. The FWS strongly requests that BLM not lift any PLO 5150 withdrawals immediately adjacent to Kanuti NWR. These lands are of national interest and should remain in the federal estate to act largely as buffers between CSUs (like Kanuti NWR) and the increasingly intensive development that is occurring and is anticipated near the Trans-Alaska Pipeline System (TAPS) and Dalton Highway.
Alternative C
3.1 line 1. My preference is Alternative C for this line, with 6.7 million Acers open to locatable mineral entry and 6.6 Million Acres withdrawn.
3.1 line 2. I prefer Alternative A and B. No lifting of the PLO 5150.
3.1 line 3. I prefer Alternative C for areas of withdrawal from mineral entry.
3.4 Areas of Critical Environmental Concern (ACECs) Line 1. I feel generally Alternative C provides protection of areas of critical resource habitat. Line 2. I also feel Alternative C would primarily provide protections of resources without unnecessarily impeding other uses.

Table B-2
Support for Alternatives

Line 15. Alternative C preferred I made the nomination for the Midnight Dome/ Kalhabuk Dall's sheep movement to winter habitat as an ACEC. The current level of use by a few miners and local residents is not impedance to sheep movements. My concern is winter exploration in the alpine when sheep need critical habitat. Sheep movements trails across the Nolan Road occurs over an area ½ a mile West of the Drinking Cup Creek, to 1.5 miles to the East of the Drinking Cup. Camps, elevated pipelines, and other obstructions should be avoided in this section of the Nolan Road. I also would be concerned with opening OHV use to the general public, and allowing high power snow machines to go into the critical habitat.
Off-Highway Vehicle (OHV) and Travel Management Line 1. Alternative B, C & D preferred. Line 2. Alternative C preferred. Line 3. Alternative C preferred.
3.4 Areas of Critical Environmental Concern (ACECs) Line 1; Opt. B Line 2; Opt. B Line 7; Opt. B Line 14; Opt. A Line 15; Opt. C Line 16; Opt. C Line 17; Opt. B or C Line 18; Opt. A Line 20; Opt A
3.5 Recreation Management Areas Line 1; Opt. B Line 2; Opt. C
AMA supports the statement in the overview for the Lands and Realty Section that under alternatives B, C, and D BLM will recognize the Ambler and Umiat road corridors. This provision should be included in ALL alternatives.
In Alternatives B and C, we agree that the range of alternatives and the relative proportions of lands to be retained in federal ownership through not lifting the Public Land Order (PLO) 5150 withdrawal seem reasonable. Alternative C allows 157,400 acres of the PLO 5150 withdrawal to be lifted, which could make these lands eligible for transfer to the State of Alaska or Alaska Native Claims Settlement Act (ANSCA) Corporations that want to fulfill their lands entitlements. We agree that more intensive development is appropriate near designated "development nodes" of the "inner corridor" and that future public services and infrastructure along the Dalton should be accommodated at these development nodes. Conversely, we also believe that there are areas that must remain in the federal estate because they are immediately adjacent to federal Conservation System Units. The FWS strongly requests that BLM not lift any PLO 5150 withdrawals immediately adjacent to Kanuti NWR. These lands are of national interest and should remain in the federal estate to act largely as buffers between CSUs (like Kanuti NWR) and the increasingly intensive development that is occurring and is anticipated near the Trans-Alaska Pipeline System (TAPS) and Dalton Highway.
Alternative D
Off-Highway Vehicle (OHV) and Travel Management Line 1. Alternative B, C & D preferred. Line 2. Alternative C preferred. Line 3. Alternative C preferred.

Table B-2
Support for Alternatives

I support Alternative D which most closely advocates the "multiple use" mandate of the Bureau of Land Management (BLM), and provides the maximum opportunity for resource exploration and development. Alternative D also provides the greatest opportunities for public access, especially to remote State and private property.
I also support Alternative D for ACECs, in which only one ACEC and one Research Natural Area are proposed.
I support Alternative D which most closely advocates the "multiple use" mandate of the Bureau of Land Management (BLM), and provides the maximum opportunity for resource exploration and land development. Alternative D also provides the greatest opportunities for public access, especially to remote State and private property.
I also support Alternative D for ACECs, in which only one ACEC and one Research Natural Area are proposed.
Overall, AMA supports Alternative D as it adheres most closely to the "multiple use" mandate of the Bureau of Land Management, and provides the maximum opportunity for resource exploration and potential development, including mineral exploration and development. Alternative D also provides the greatest opportunities for public access, including potentially necessary access to State and private (primarily land owned by Alaska Native Claims Settlement Act [ANCSA] corporations), and provides opportunities for overland access to remote communities.
AMA strongly supports Alternative D's proposal to revoke most of the outdated ANCSA Section 17(d)(1) land withdrawals.
AMA strongly supports Alternative D for locatable minerals as it ensures that any land currently open to locatable mineral entry remains open, and ensures that most currently closed lands would be opened.
AMA supports the statement in the overview for the Lands and Realty Section that under alternatives B, C, and D BLM will recognize the Ambler and Umiat road corridors. This provision should be included in ALL alternatives.
AMA supports Alternative D for Lands and Realty overall, and supports Alternative D under Lands and Realty for the Dalton Highway–Utility Corridor (PLO 5150) as it rightfully allows the State of Alaska to take ownership of the land that provides critical access to State land on the North Slope of Alaska.
AMA recommends BLM adopt Alternative D for ACECs.
RDC supports Alternative D as it adheres most closely to the "multiple use" mandate of the Bureau of Land Management (BLM).
Alternative D provides the greatest opportunities for public access, including potentially necessary access to State and private projects (primarily land owned by Alaska Native Claims Settlement Act [ANCSA] corporations), and provides opportunities for overland access to remote communities.
I support Alternative D which most closely advocates the "multiple use" mandate of the Bureau of Land Management (BLM), and provides the maximum opportunity for resource exploration and land development. Alternative D also provides the greatest opportunities for public access, especially to remote State and private property.
I also support Alternative D for ACECs, in which only one ACEC and one Research Natural Area are proposed.

Table B-2
Support for Alternatives

TMC supports Alternative D as proposed. This alternative would provide for the most opportunities for our operation and others working in resource development. It is the most open to multiple-use for improving our very limited access and expansion opportunities in the planning region.
Alternative D must be carried forward to maintain a balanced range of alternatives.
Taiga Mining Inc. strongly supports Alternative D as proposed. This alternative should be carried forward as written into your final list of alternatives in the draft RMP.
The proliferation of quasi-wilderness areas, ACECs, special use areas, research areas, etc., compels me to ask BLM to go with Alternative D.
ACECs submitted by special interests to prevent mining under the guise of wilderness opportunities are inappropriate, thus giving me yet another reason to ask for Alternative D.
I like the freedom for mineral exploration granted in Alternative D. I also like the clearance for the pursuit of the Umiat and Ambler roads.

Table B-3
Impacts

Lands and Realty
Isn't it correct that the plan is only legally affective on BLM lands and not adjacent lands?
What is BLM managed lands? 13 million; what is the state selected count? 4 million? Question about how the PLO 5150 lands move into state status. It would be nice to see a map that takes the high priority state selections out and then look only at what BLM would have as a remainder.
Is there any significant financial benefit to BLM to open the lands?
In the Dalton corridor if BLM gives those lands to the state, then BLM is not managing them for multiple uses, the BLM is not managing them at all and we are used those lands being managed by the federal government for the pipeline. The federal role good and bad but the federal government does have accountability. Does the state have the capability have managing that pipeline in these times? What will be the cost to the state from the new management responsibilities if vast areas of the land are conveyed to the state and they have to take on new management? I think this needs to factored into the impact analysis.
Dalton Highway is unique. It has a frontier road characteristic to it. There have been some changes over time and increased hunting and associated problems but it remains a frontier. Some general observations, had PLO 5150 been lifted within the last 38 years, the character of the road would be drastically different and the character of the experiences along the way. I encourage BLM to give this some serious though. This is public land and the difference between federal stewardship and state stewardship is probably quite different.
Discussion about the finger of land that points toward Venetie and why that is not FWS.
Strip of land (toward Venetie) was original a ROW to bring in a cat train for overland transport. BLM should review if this is still allowable or in place. What is the status of the ROW? Additional concerns about the RS2477 road that runs through and to the north of Venetie and how would this affect additional potential mining. Could this lead to a more permanent road and what would this meant to Venetie residents? Would lifting 5150 allow the road to go in considering that BLM has not recognized that RS2477 to date? Venetie would like BLM to look at those routes and consider the effects.
Why does the state want the land and how would BLM benefit?
If 5150 ruling- still stands, under paragraph d, subsection …. Once selections done, State of Alaska can't select again…. Concern that this is more selections by the State. Discussion about top-filing.
Discussion about concerns about the fact that the State of Alaska is over selected. "Is State of Alaska sitting in the background, waiting to pick up some lands?"
Will those top filed lands benefit the State of Alaska?
Connectivity corridors near the Dalton Highway would require frequent monitoring and permitting enforcement, whereas those outside the Dalton Highway corridor would require less monitoring.
A recommendation to lift PLO 5150 in its entirety would not leave gaps in ownership within the corridor.

Table B-3
Impacts

The following comments apply to the block of BLM lands south of the eastern portion of Selawik National Wildlife Refuge. These adjacent BLM-managed lands are bordered to the south by Koyukuk NWR land. Currently, there are State-selected lands within this BLM area as well as several parcels not State selected that will remain under BLM management. We believe that for reasons of efficient management, landscape connectivity, public use, and resource protection, these lands between the two National Wildlife Refuges should remain federal public lands with limited issuance of rights-of-way for development. Supporting information is provided below.

Efficient management: Retaining BLM management of lands in this area will avoid the creation of small, isolated BLM islands surrounded by other lands. Landscape connectivity: Limiting the development that takes place in this slice of land between Selawik and Koyukuk NWRs will allow for greater wildlife usage of the lands and interconnection of the habitat within the two refuges. Large amounts of connected habitat are important in the face of environmental change to enable movement and shifting habitat use that follows shifting ecotypes. See the comments from Kanuti NWR for analyses and suggested methods for implementation. Connectivity models using methods robust to climate change are currently available for BLM to use.

Public use: Federally-qualified subsistence users in rural Northwest Alaska have extremely limited access to land status maps and other tools which can help them know where they are eligible to hunt under federal subsistence regulations. When boundaries or land conveyances create a complicated patchwork of land ownership, this adds to the confusion for rural residents who are the primary users of these lands and impedes their subsistence practices. Maintaining BLM land management between the two National Wildlife Refuges creates a large area of federal public lands, managed similarly, which can be more clearly understood by local users and which would facilitate public use.

Resource protection: As described above, the Selawik River and Kobuk River watersheds are valuable fish habitat. They host the only two spawning areas in the region for sheefish (inconnu). The Kobuk has a significant run of chum salmon, which contributes to the commercial salmon fishery in Kotzebue Sound, and both rivers have sizable populations of whitefish, pike, and burbot. The Selawik River is also of regional importance as a rearing area for juvenile fish due to its rich aquatic environment (Brown 2004). Taken together, these fish resources are vital to the subsistence economy of six villages and the regional hub of Kotzebue. In a 2010 community-based harvest survey, the village of Selawik harvested over 500,000 pounds of wild food, and four of the top five harvested resources were fish (ADF&G 2011). These high value fisheries deserve protection from adverse effects from rights-of-way, mining, and other developments on adjacent BLM lands.

The lands to the east and south of Selawik National Wildlife Refuge that fall within the Central Yukon RMP are also habitat for the Western Arctic Caribou Herd, the largest caribou herd in Alaska. These lands include both winter range for the herd as well as outer/peripheral range (Western Arctic Caribou Herd Working Group 2011). The Western Arctic Caribou Herd is a vital subsistence resource for over 25 communities, and protection of its habitat and migratory routes, as well as allowance of a buffer for shifting habitat use in future, is strongly advised for the Central Yukon RMP.

Lands with Wilderness Characteristics

Also affected would be the current spectacular wilderness aesthetic of this area. Once entered for mining purposes, this aesthetic will be permanently lost. Some argue that Alaska has plenty of wild lands in which this can remain.

Table B-3
Impacts

…just north of Coldfoot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
Fragmenting the landscape with a patchwork of management strategies, allowed uses, and access would cause confusion among user groups, conflicts among user groups (where currently there are few), loss of important wildlife corridors, reduced resiliency of wildlife to adapt to climate change, and an overall reduction in the quality, quantity, and value of the fish, wildlife, water, habitat, and wilderness resources that are important to me and many Alaskans.
If PLO 5150 is modified, that will result in my and other current user groups losing important and long-standing access to high quality habitat, water, fish, wildlife, and wilderness resources, forever.
Allowing OHV use would ruin the wilderness character of the planning area and displace many current users. It would also result in permanent damage to the permafrost-adapted habitats through creation of ruts, erosion, accelerated permafrost thawing, and alteration of local hydrology.
Alternatives for the RMP and provisions to liberalize summer OHV use along this corridor would result in catastrophic failure of your stated goals for Lands with Wilderness Character and overwhelm your management of Recreation Management Areas.
Any changes that lift the current access restrictions will upset the user balance that has been in place for years along the Dalton Highway. If that happens it will undoubtedly jeopardize the backcountry experiences and characteristics that I hold dear.
Great consideration should also be paid to how lands with wilderness character may be lost by other use authorizations on or adjacent to this type of land. For example, the incompatibility of roads or other industrial activities may compromise wilderness values.
Numerous statutory exceptions in ANILCA, which apply to designated wilderness, do not apply to BLM multiple-use lands being managed to protect wilderness character. This could easily result in BLM multiple-use lands being managed more restrictively than ANILCA CSUs (including designated Wilderness), or being managed inappropriately to the non-impairment standard in FLPMA Section 603 in the event BLM forwards wilderness recommendations in the future, pursuant to ANILCA Section 1320.
Areas of Critical Environmental Concern (ACECs)
We oppose lifting PLO 5150 and believe that ownership and management of the Dalton Highway corridor should remain the same. Changes to this PLO and the administration of these lands would greatly complicate subsistence resource management and would likely increase the competition for subsistence resources within the region, particularly between rural residents and visiting hunters. Additionally, numerous existing ACECs and RNAs exist within this 2.1 million acre corridor.

Table B-3
Impacts

Recreation Management Areas
Dalton Highway Corridor would be managed as three separate but geographically congruent SRMA's. In a corridor with increasing use by tourists and sportsmen, three discrete units would ultimately be more efficient to protect by enforcement personnel (especially against unlawful use by OHV's) than one unwieldy extended unit.
There will be hundreds of people using the Ambler Road for hunting. ADOT ran the check stations, DOT should have records of people going through disaster Creek. BLM should check these records. The state stopped running the check station and then abandoned it so the Borough ran a check station but gave up due to the high numbers. First Alyeska check station at the Yukon River and then moved to Disaster Creek about a mile from the Dietrich camp in 1982, ran it for a year or so. The Borough ran it at the borough line and ran for a year or so and then all pulled out.
State land selection & mineral entry within this corridor would seriously threaten the water quality of adjacent areas & recreational opportunities along the highway.
The areas around Finger Mountain, Kanuti River Crossing, Beaver Slide, Fish Creek, Arctic Circle Viewpoint, the Forks of Bonanza Creek, & Gobblers Knob are extremely scenic. State land disposals, mining activity, & development in general would distract appreciably from the experience of driving along this wilderness highway.
The Ivotuk air strip is a major entry point for backpackers that fly into this area to begin exploring this corner of the Brooks Range.
There are so few places in Alaska where you can escape OHV's, placer mines, mineral claims, small scale mines, and large scale mines all by just walking out the door of your vehicle. The current BLM planning area allows for those of us who want to escape these activities to do so and allowing for mineral exploration and development would remove this opportunity from me.
Adding infrastructure outside this corridor would lessen my enjoyment of this landscape, increase the ever growing network of trails, roads, ruts, powerlines, towers, etc., most of which negatively impact the fragile habitats and highly valuable habitat, fish, and wildlife resources of this area.
Not protecting the wilderness characteristics of the planning area would likely have similar effects there, resulting in scarcer game that is harder to access for those without expensive OHV's or motor boats, lower quality outdoor experiences due to crowding, and shortened hunting seasons.
…multiple use that includes OHV and mining means that the landscape is dominated by these uses to the exclusion of others. The uses that are excluded are those that I value and participate in, including non-motorized hunting, fishing, camping, hiking, skiing, and floating. While they may not be excluded by regulation, in most other lands not specifically designated for such uses, they always lose-out to OHV users and miners.
Allowing non-local OHV use at any time of the year will negatively impact habitats, wildlife resources, fish resources, users' enjoyment of the area, and hunting season length.
The Steese Highway hunt is a perfect example of what would happen if OHV's are allowed; the quota of caribou would be harvested in a short period of time by relatively few people who have enough money to buy OHV's and who lack an understanding of the long-term impacts that OHV use has on the land. This also has trickle-down effects on ADF&G and their ability to manage game populations and quality hunting experiences.

Table B-3
Impacts

Non-consumptive Tourism: Non-hunting tourism to experience the Dalton Highway drive to Prudhoe Bay is extremely popular (multi-national user groups), and these land users are attracted to the uniquely wild character of this corridor and its wildlife unavailable on this scale anywhere else in Alaska. This industry is a substantial contributor to the state (local and rural) tourism economy, and the perceived value of the future corridor will greatly affect the corridor's actual economic return.
Any disruption in the current land use and management that affects the wild character of this region will concentrate hunter groups into the most desirably (and accessible) productive areas and displace many groups to search elsewhere for undisturbed lands and animals.
This CYRMP adds a new layer of concern for the service providers who currently depend on BLM's management to remain consistent and stable as it has been for the past two generations. This decision forces the use of public lands to the north, east and west of this planning area, and this displacement causes overcrowding concerns within other "at-full-capacity" hunting corridors.
Subsistence caribou hunting closures west of the Dalton Highway near the BLM's western borders (WSA16-01 and WSA17-02) closed massive swathes of federal public lands for hunting caribou and moose. We would like to see an Alternative that adequately addresses the anticipated huge increase in public use and hunting demand along the Dalton Highway and elsewhere in the planning area. There is a current land-use crisis happening in the region west of this planning area. BLM should consider how these closures will negatively affect this planning area and its borders to the north and east.
Recreation Management Areas that allow motorized use and trail proliferation will negatively impact local game populations and create front- and middle country impacts where wild backcountry currently exists. Areas of most popular use (RMAs) will create concentrated access points elsewhere for backcountry hunters, which forces a competition component among them that currently does not exist. Front country and backcountry user groups have competing ideals and expectations; therefore, they require separate and distinct areas to play and/or restrictions on mechanical toys to level the game and lesson the impacts.
Alternatives for the RMP and provisions to liberalize summer OHV use along this corridor would result in catastrophic failure of your stated goals for Lands with Wilderness Character and overwhelm your management of Recreation Management Areas.
Overall, we believe that the significant withdrawals as outlined in Alternative B (12,752,000 acres) would allow for the natural habitat to thrive and maintain diverse wildlife and fish populations for subsistence and recreational hunting and fishing.
Restrictions on motorized access within ACECs could preclude access in both summer and winter for the public, including hunters, anglers, and wildlife viewers.
Prohibiting OHV access off the Dalton corridor and spur routes could minimize sport fisher access and reduce user-group conflicts. We expect this would be true of most hunting activities as well.
Off-Highway Vehicle and Travel Management
Concerns about the potential for the roads to resources state might consider (road to Nome) past the Melozi area and the impacts.
Concerns about transporters issues- unregulated guide issues- did the plan address these? The transporters are unregulated and accessing area (cutting trails, etc.).

Table B-3
Impacts

Bettles/Evansville have expressed concerns with roads and development. This is documented in Gate of the Arctic Subsistence Research Commission. BLM needs to review this.
Wiseman is one of 10 Resident Zone Communities that have Customary and Traditional use eligibility inside of the Gates of the Arctic National Park. The only winter access to traditional areas to the west, is with snow mobile through the Wiseman valley or up the Hammond River drainage. In dry season highway vehicles are used to get as close as possible on the Nolan and Hammond River roads. If these areas we e State land, it would preclude access to traditional hunting and trapping areas inside the Gates of the Arctic National Park, under state regulations.
State regulations would preclude use of snowmobile for any subsistence use, and would preclude transporting any hunter, game or gear with a highway vehicle no further than 1/4 mile from the Dalton Highway. Wiseman Village is 3 miles from the Dalton. Wiseman would effectively be isolate from Park or other Federal land access by Title VIII sec. 811 customary use of snowmobile, or even licensed highway vehicles to our homes with game resources.
The loss of the ability to harvest subsistence resources with customary and traditional methods adjacent to these Communities on the Federal Public Lands would place an extremely great hardship on the local residents. I have written this addendum to my oral comments to clarify how the State's request would affect the National Interest and the physical and social welfare of Wiseman and Coldfoot's subsistence users.
Concern about the Ambler Road EIS and how this impacts the LUP.
Managing the planning are specifically for wilderness characteristics will offer the highest degree of resource protection and ensure high quality water, habitat, fish, wildlife, landscape, and viewscape resources for me and my fellow Alaskans (and tourists) to enjoy.
…both Alternatives A and B propose to designate 33 ACECs and RNAs, more than doubling the total existing ACEC and RNA acreage to more than 4 million acres—an area larger than the size of Connecticut. Such expansive designations, and the adoption and implementation of special management measures, could significantly frustrate access to and use of lands and resources in the planning area.
BLM should be aware that the effect of any decision to designate ROW exclusion and avoidance areas would be substantial, making it significantly more difficult for Doyon and other non-federal landowners to access their lands, and implicating access rights under ANILCA.
Applying ROW exclusion or avoidance area designations could unnecessarily preclude future access needs or interfere with the statutorily required ANILCA Title XI process.
Restrictions on motorized access within ACECs could preclude access in both summer and winter for the public, including hunters, anglers, and wildlife viewers.
Many of the ACECs proposed for summer OHV restrictions are within five miles of the Dalton Highway, where OHV use is already restricted under state law. We request that the impact analysis in the draft plan compare the status quo with the proposed restrictions so as not to overstate the impacts of the BLM restrictions.
Numerous ACECs identified in Alternative B as ROW exclusion areas and in Alternative C as ROW avoidance areas are currently being used for overland travel in the summer, and, or winter.

Table B-3
Impacts

The Upper Kanuti River ACEC is listed as a ROW avoidance area yet it overlaps the Dalton Highway, TAPS, and RS2477 winter routes to state lands, including Squaw Creek Mine in the Chandalar District. Alternative B proposes that travel be closed during the summer yet the Kanuti Camp airstrip and access road are within the boundary of the ACEC.
The Upper Teedriinjik (Chandalar) ACEC ROW avoidance area conflicts with RS2477 winter routes to state lands. In the original ACEC Report (Table 3), BLM found that this proposed ACEC met fisheries/riparian criteria but did not meet the wildlife criteria. We concur with that conclusion and question whether the inclusion for wildlife values is an error. If intentional, we request BLM provide new information and the relevance and importance analysis that supports its inclusion. If not, designation of this area as an ACEC for wildlife values is not justified and therefore unnecessary.
The Indian River ACEC ROW avoidance area conflicts with RS2477 winter routes and should not be included as special management.
Alatna River ACEC. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The Alatna River ACEC conflicts with an RS2477 winter route. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and is therefore unnecessary.
Even the no-change Alternative A is flooded with restrictive uses on all sides, making one fear breaking some sort of law or policy or regulation simply by wanting to go into the country when going off-road for any sort of outdoor recreation.
Although the alternative matrix is not the place to discuss impacts, in anticipation of alternative impacts review, we suggest the additive and synergistic impacts of repeated permit actions such as placer mining, rights-of-way, and other transportation/development decisions, etc. be fully analyzed within the EIS.
Subsistence Use, Traditional Use Areas
Allowing hunting guides and Air taxis into the area decimating local sheep and other wild game the locals rely upon for subsistence needs.
Concerned about the area open near the Yukon River open lands to the public giving them access to subsist on river.
Village of Rampart is concerned about already limited resources for personal use.
There were strong moose populations in the 1970's and 1980's, the numbers have depleted. Hunting/subsistence ranges are getting smaller and the need to travel further to get to resources. This has a cost (fuel, time). The permits that were provided in the 1980's really put a dent on the moose population. Community desire to prevent permitted hunting up the Koyukuk for moose and black bear. Reports of seeing no moose all the way to Huslia.
Main subsistence species are moose, fish (salmon), black bear, beaver, ducks, and geese. The berry harvest is has changed. Climate change has removed permafrost which has affected the berry crop. Our food is being taken away. The main thing we want to save is our moose.
Concerns about non-native hunters hunting just off of native lands.
Hogatza river is the traditional Huntington family hunting grounds and the family is still using the area.

Table B-3
Impacts

All of the BLM managed lands (yellow) should never be influenced negatively for subsistence uses (anything of harvest of the resources- not commercial); all of the yellow is important and potentially usable by the people. Preferred no improvements to individual transportation.
Concerns about the proposed Ambler Road disrupting the social structure of life in Allakaket. Cumulative and indirect impacts of people accessing lands off of the road corridor and competition for resources.
Concerns that if lands in PL0 5150 are given to the state that it would open those lands up for hunting and hunters would come further in toward the community and affect available resources.
Roads will bring in competition for resources. Concerns about antifreeze and other elements associated with the road and how it will get into the rivers. I hope you can understand that we like to keep our way of life.
We need to look at alternatives to caribou and moose. Steven's Village is doing Bison farming and others are looking at herding reindeer. We need to look at agriculture, greenhouses. Villages are all talking out these things. We need to be prepared if these things cut off our moose and caribou.
We are concerned about our river access and we don't want that disturbed. It's there for our subsistence use.
There is a lot of the BLM alternatives that make sure there is connectivity with existing CSUs. How this affects subsistence resource and users is a multi-varied analyses, it's not even a simple overlay and I think the process is a "how much land are we using for this and that" approach and I encourage a deeper approach in each of the alternatives.
I oppose the PLO 5150 lands turned over to the State of Alaska, for the reason that ANILCA Provisions would not be afforded under State ownership, for subsistence access.
BLM needs to consider that all waters in BLM managed lands that flow toward Venetie have an impact on subsistence. Water related issues are the most important aspect of subsistence for Venetie residents. Specifically in the creeks off of the Chandalar.
How many other communities have customary and traditional use within the corridor: Allakaket, Alatna, Hughes, Anaktuvuk Pass, Nuiqsut, Stevens Village, Rampart, Bettles, Evansville. These will need to be considered and analyzed under 810 for subsistence.
Finding the State's request for modification of PLO 5150 to be invalid, an ANILCA Title VIII sec.810 analysis would need to be adhered to, except for sec. 810(3)(C) (c), with diligence paid to the extreme detriment to the communities of Wiseman and Coldfoot.
The Middle Fork/ Dietrich Valleys have provided the primary subsistence for these communities for 120 years.
Subsistence uses are as important to the residents of this area today as they were in the past. If the State receives these lands as a gift, it would put local people in grave hardship. State regulations provide only sport-hunting opportunities with archery.

Table B-3
Impacts

Wiseman is one of 10 Resident Zone Communities that have Customary and Traditional use eligibility inside of the Gates of the Arctic National Park. The only winter access to traditional areas to the west, is with snow mobile through the Wiseman valley or up the Hammond River drainage. In dry season highway vehicles are used to get as close as possible on the Nolan and Hammond River roads. If these areas were State land, it would preclude access to traditional hunting and trapping areas inside the Gates of the Arctic National Park, under state regulations.
State regulations would preclude use of snowmobile for any subsistence use, and would preclude transporting any hunter, game or gear with a highway vehicle no further than 1/4 mile from the Dalton Highway. Wiseman Village is 3 miles from the Dalton. Wiseman would effectively be isolate from Park or other Federal land access by Title VIII sec. 811 customary use of snowmobile, or even licensed highway vehicles to our homes with game resources.
Much concern about the Road to Umiat on the changes it would bring to Anaktuvuk Pass. Concerns about competition for resources like Caribou. There are many historical sites along the Itkillik River (Charles x has the sites) = need to get these.
Not only would development impact resources directly, but by increasing access it would put hunting areas, traplines, berry patches, cabins, trails and trail use all at risk from overuse, vandalism, theft, and the restrictions that inevitably follow when conflicts occur.
Mineral and oil development adds to those concerns the likelihood of significant or even devastating pollution.
The Steese Highway hunt is a perfect example of what would happen if OHV's are allowed; the quota of caribou would be harvested in a short period of time by relatively few people who have enough money to buy OHV's and who lack an understanding of the long-term impacts that OHV use has on the land. This also has trickle-down effects on ADF&G and their ability to manage game populations and quality hunting experiences.
Subsistence Lifestyle: Liberalizing development or recreation south of Atigun Pass will impact rural communities along the Dalton Highway and downstream on the Koyukuk and Yukon rivers.
Both Alternatives A and B propose to designate 33 ACECs and RNAs, more than doubling the total existing ACEC and RNA acreage to more than 4 million acres—an area larger than the size of Connecticut. Such expansive designations, and the adoption and implementation of special management measures, could significantly frustrate access to and use of lands and resources in the planning area.
Resource management planning decisions that will be made in the course of developing the RMP could impose significant limitations on access and activities that could adversely impact these customary and traditional uses.
ANILCA Title VIII sec. .810 analysis would show lifting the PLO 5150 to not only restrict, but eliminate Subsistence on the lands afforded current Federal subsistence uses. The Primary communities using the Utility Corridor lands are Wiseman and Coldfoot. But the Communities of Stevens Village, Evansville/Bettles, Allakaket/Alatna, Hughes, Anaktuvuk Pass, and Nuiqsut use or historically use these lands.
Loss of Federal land status would mean no subsistence priority for those persons that are highly reliant on "fish, and wildlife, and other wild renewable resources." Local residents would be displaced from traditional use in the Utility Corridor, to hunt moose and other large game at distances that would be nearly impossible, or impossible to transport, with much greater expense.

Table B-3
Impacts

Fragmenting lands into discontinuous smaller areas is not in the best interest of people who are engaged in a subsistence way of life.
Overall, we believe that the significant withdrawals as outlined in Alternative B (12,752,000 acres) would allow for the natural habitat to thrive and maintain diverse wildlife and fish populations for subsistence and recreational hunting and fishing.
We oppose lifting PLO 5150 and believe that ownership and management of the Dalton Highway corridor should remain the same. Changes to this PLO and the administration of these lands would greatly complicate subsistence resource management and would likely increase the competition for subsistence resources within the region, particularly between rural residents and visiting hunters. Additionally, numerous existing ACECs and RNAs exist within this 2.1 million acre corridor.
Creating reasonable administrative allocations in areas deserving of protections will provide key safeguards for local community subsistence needs and important ecological values.
Pew has met with many Tribes adamantly opposed to turning this corridor over to state management because of the significant changes that would befall communities regarding subsistence resources management and the likely significant increase in competition for those resources from Dalton Highway travelers.
Because existing state regulations restrict OHV (including snowmachine) use within the Dalton Highway Corridor, except for a few specific purposes, the vast majority of OHV use in the planning area is outside the DHCMA. These areas are not road accessible and most users are likely to be federally-qualified subsistence users. As a result, restrictions on OHV use will primarily affect subsistence users; therefore, restrictions on non-subsistence OHV use will likely have little to no effect on resource values.
Published research demonstrates the adverse effects of roads on caribou movement (Wilson et al. 20 16) and caribou habitat (Wilson et al. 2014, Chen et al. 20 17). This is important in relation to the proposed Ambler Road corridor and any other road corridors (e.g., Umiat) that would be developed to access areas with mineral potential. Effects here accrue to not only wildlife, but also subsistence users who rely on wildlife.
Prohibiting OHV access off the Dalton corridor and spur routes could minimize sport fisher access and reduce user-group conflicts. We expect this would be true of most hunting activities as well.
Residents of Alatna and Allakaket boat up the Alatna and John Rivers to hunt sheep. Any changes to that access (or allowing unlimited boat access up those rivers by non-subsistence users) would be an issue.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.

Table B-3
Impacts

The following comments apply to the block of BLM lands south of the eastern portion of Selawik National Wildlife Refuge. These adjacent BLM-managed lands are bordered to the south by Koyukuk NWR land. Currently, there are State-selected lands within this BLM area as well as several parcels not State selected that will remain under BLM management. We believe that for reasons of efficient management, landscape connectivity, public use, and resource protection, these lands between the two National Wildlife Refuges should remain federal public lands with limited issuance of rights-of-way for development. Supporting information is provided below.

Efficient management: Retaining BLM management of lands in this area will avoid the creation of small, isolated BLM islands surrounded by other lands. Landscape connectivity: Limiting the development that takes place in this slice of land between Selawik and Koyukuk NWRs will allow for greater wildlife usage of the lands and interconnection of the habitat within the two refuges. Large amounts of connected habitat are important in the face of environmental change to enable movement and shifting habitat use that follows shifting ecotypes. See the comments from Kanuti NWR for analyses and suggested methods for implementation. Connectivity models using methods robust to climate change are currently available for BLM to use.

Public use: Federally-qualified subsistence users in rural Northwest Alaska have extremely limited access to land status maps and other tools which can help them know where they are eligible to hunt under federal subsistence regulations. When boundaries or land conveyances create a complicated patchwork of land ownership, this adds to the confusion for rural residents who are the primary users of these lands and impedes their subsistence practices. Maintaining BLM land management between the two National Wildlife Refuges creates a large area of federal public lands, managed similarly, which can be more clearly understood by local users and which would facilitate public use.

Resource protection: As described above, the Selawik River and Kobuk River watersheds are valuable fish habitat. They host the only two spawning areas in the region for sheefish (inconnu). The Kobuk has a significant run of chum salmon, which contributes to the commercial salmon fishery in Kotzebue Sound, and both rivers have sizable populations of whitefish, pike, and burbot. The Selawik River is also of regional importance as a rearing area for juvenile fish due to its rich aquatic environment (Brown 2004). Taken together, these fish resources are vital to the subsistence economy of six villages and the regional hub of Kotzebue. In a 2010 community-based harvest survey, the village of Selawik harvested over 500,000 pounds of wild food, and four of the top five harvested resources were fish (ADF&G 2011). These high value fisheries deserve protection from adverse effects from rights-of-way, mining, and other developments on adjacent BLM lands.

The lands to the east and south of Selawik National Wildlife Refuge that fall within the Central Yukon RMP are also habitat for the Western Arctic Caribou Herd, the largest caribou herd in Alaska. These lands include both winter range for the herd as well as outer/peripheral range (Western Arctic Caribou Herd Working Group 2011). The Western Arctic Caribou Herd is a vital subsistence resource for over 25 communities, and protection of its habitat and migratory routes, as well as allowance of a buffer for shifting habitat use in future, is strongly advised for the Central Yukon RMP.

Table B-3
Impacts

Loss of Access to Subsistence Resources wherever PLO 5150 is lifted If PLO 5150 is lifted, subsequent state selection and conveyance of lands within the inner and/or outer corridor would result in loss of the federal subsistence priority for rural residents. AS 19.40.2 10 (the prohibition of off-road vehicles and the prohibition from using firearms within the corridor management area) would diminish subsistence opportunity for users residing within the corridor. ANILCA sections 811 and 1110 allow use of snowmachines and other means of transportation by local residents on all federal public land. During revisions of resource management plans in Alaska, the BLM is required to provide for reasonable access to subsistence resources according to these ANILCA provisions. Lifting the entire PLO 5150 could create significant conflicts with adjoining federal conservation unit mandates, refuge comprehensive conservation plans and Alaska National Wildlife Refuge purposes, which dictates that we must provide for continued subsistence opportunities. With the exception of important infrastructure development and services nodes (e.g., Yukon Crossing, Coldfoot, etc.), we recommend that PLO 5150 be retained in its entirety to help ensure that subsistence opportunity is afforded to the residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Dalton Highway Corridor Management Area.
The BLM manages watersheds upstream of five interior Alaska National Wildlife Refuges including Yukon Flats, Kanuti, Koyukuk, Nowitna, and Innoko. These National Wildlife Refuges are identified, at least in part, as BEACONS ecological benchmark areas. If upstream areas are protected by BLM for some Refuges, such as Kanuti NWR, then it can serve as a benchmark for BLM monitoring and adaptive management purposes. Protecting these upstream watersheds by maintaining PLO withdrawals will help these refuges meet their refuge purposes related to maintaining water quality and quantity, fulfilling migratory treaty acts with respect to salmon, and for providing for continued subsistence opportunities.
PLO 5150 Alt B or C-Dall River is headwaters into Yukon Flats NWR and Steven's Village. Concerns about changes in water quality impacts. Dall river has hot springs, native allotments. The Dall river traditionally fed the tribe. Waterfowl hunting (canvas backs, pintail, mallard, geese), resident pike population (historically but over fished in the past few years, with the opening of the Haul Road). Important waterway to access resources.
The early concept alternatives do not adequately recognize the critical importance of watershed health in providing for subsistence, on Koyukuk NWR, and on the BLM lands that surround the refuge. These watersheds form one system, on- and off- the refuge, that people residing in the villages of Hughes, Huslia, Koyukuk, and Galena rely upon. Actions that diminish watershed health will affect the ability of these systems to provide adequate subsistence opportunity. By following our recommendations in the above paragraphs, you will enable the systems to continue to provide for subsistence.
The early concept alternatives do not adequately recognize the critical importance of watershed health in providing for subsistence, on Innoko/Kaiyuh Flats NWR, and on the BLM lands that surround the refuge. These watersheds form one system, on- and off- the refuge, that people residing in the villages of Kaltag, Nulato, Koyukuk, and Galena rely upon. Actions that diminish watershed health will affect the ability of these systems to provide adequate subsistence opportunity. By following our recommendations in the above paragraphs, you will enable the systems to continue to provide for subsistence.

Table B-3
Impacts

The early concept alternatives do not adequately recognize the critical importance of watershed health in providing for subsistence, on Nowitna NWR, and on the BLM lands that surround the refuge. These watersheds form one system, on- and off- the refuge, that villagers residing in Ruby and Tanana rely upon. Actions that diminish watershed health will affect the ability of these systems to provide adequate subsistence opportunity. By following our recommendations in the above paragraphs, you will enable the systems to continue to provide for subsistence.
Air Resources
Development in the region could strongly affect air quality as well as deposition of fine particulate matter throughout the region and should be considered in the environmental impacts analysis, particularly in zones where mineral extraction would be concentrated.
Climate Change
Concerns about moose this past year showing skinny moose and worms. This happened this year and there is a concern that all the rain has contributed to this. Discussion about the trends of more rain as the climate changes.
On climate change, will BLM be willing to change dates for harvest? Everything is getting later and later (spring/fall). Discussion about who manages the harvest…further questions about how BLM will adjust and address climate change issues. Harvest is moving further late into the fall. Our main food sources is moose and fish and vital to the community. We are lucky to get a moose but it requires going further out each year.
Disruption of the carbon sequestering capability of the tundra.
The potential for the harmful effects of CO_2 and methane on climate change if these areas are developed.
Finally the impact of methane resulting from developing, transporting and using natural gas has even greater deleterious effects on the environment than CO_2 and should not be supported.
In this vast region, already experiencing impacts from climate change, prudence and active conservation are essential for protection of the ecosystem as plants and wildlife adjust to change.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.
If areas upstream of the Kanuti NWR are protected by BLM, then the Kanuti NWR can serve as an ecological benchmark (reference site) for monitoring the impacts of BLM-permitted activities in the face of climate change. Without upstream protection, the Kanuti NWR does not adequately meet benchmark status (i.e., too small), and BLM might have to designate more of their own lands as benchmark areas for effective comparative monitoring. This could be a mutualistic partnership in which both the Kanuti NWR and BLM would benefit.

Table B-3
Impacts

BLM plays an important role in increasing climate resilience and adaptive capacity of our landscapes. Maintaining and restoring landscape connectivity is the number one recommended climate adaptation action; by identifying core areas for landscape connectivity now, we have a better chance of preventing loss of connectivity and the need for restoration in the future. We reiterate the use of various landscape-scale planning and design approaches/tools that have already been employed to inform this plan, including the Conservation Matrix Model to create a framework that maintains flexibility in achieving regional conservation goals in the face of uncertainty, while still allowing for sustainable development.
Fish
Anything that happens on the Yukon River drainage is a spawning stream. Louden tribe and Galena residents harvest salmon and whitefish as one time or another during the year. The concern is those spawning streams like the Kassan River. So any rivers that flow into the Yukon are important to Galena. The potential for hazardous materials to get into the streams much like the Pebble mine did or what happens in Canada with their mines and how this will affect the Yukon downstream. Drift logs are also very important that come down those rivers to the Yukon. Development might affect these.
We fish at the mouth of the Koyukuk River, we are concerned about the mining off the Hogazta River. Who will police any mining operations where lands are opened up to mining?
Main spawning areas on the rivers. We can tell there is mining because the rivers are really muddy and silty. We don't want contaminated fish. We want moose meat but not beef or pork.
There is the potential if not in face of pollution from mineral extraction on lands adjacent to or within BLM jurisdiction in the far eastern panhandle entering the Chandalor R. drainage. Downstream salmon spawning habitat adjacent to or near the Venetie Reservoir would be adversely affected.
Rivers such as the Jim River, South Fork of the Koyukuk, Bonanza Creek, Fish Creek, Mosquito Fork of the South Fork, and other areas could be opened to placer mining. These drainages flow into the Kanuti NWR and could cause serious harm to the fisheries resources there.
Adding infrastructure outside this corridor would lessen my enjoyment of this landscape, increase the ever growing network of trails, roads, ruts, powerlines, towers, etc., most of which negatively impact the fragile habitats and highly valuable habitat, fish, and wildlife resources of this area.
Fragmenting the landscape with a patchwork of management strategies, allowed uses, and access would cause confusion among user groups, conflicts among user groups (where currently there are few), loss of important wildlife corridors, reduced resiliency of wildlife to adapt to climate change, and an overall reduction in the quality, quantity, and value of the fish, wildlife, water, habitat, and wilderness resources that are important to me and many Alaskans.
If PLO 5150 is modified, that will result in my and other current user groups losing important and long-standing access to high quality habitat, water, fish, wildlife, and wilderness resources, forever.
Allowing non-local OHV use at any time of the year will negatively impact habitats, wildlife resources, fish resources, users' enjoyment of the area, and hunting season length.
Overall, we believe that the significant withdrawals as outlined in Alternative B (12,752,000 acres) would allow for the natural habitat to thrive and maintain diverse wildlife and fish populations for subsistence and recreational hunting and fishing.

Table B-3
Impacts

We agree with the goal: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities" (p13). We believe that for BLM to be able to achieve the above goal/objective, strong consideration should be given to expanding the boundaries of the Upper Kanuti River Area of Critical Environmental Concern (ACEC), and Ray Mountains/Tozitna River ACEC. If these ACECs cannot be expanded, then BLM should establish two special watershed management areas that: (a) include the entire Kanuti River drainage on BLM lands; and, (b) connects the Ray Mountains/Tozitna River ACEC with the Kanuti NWR boundary and includes the greater Kanuti Kilolitna River drainage, as depicted in the Refuge's first proposed "Kanuti Kilolitna River ACEC." To avoid serious impacts to the fish, wildlife, and habitat resources of Kanuti NWR downstream of BLM lands we urge you to provide the same level of careful upstream watershed management on the Kanuti and Kilolitna Rivers as will be given to the South Fork and Jim Rivers in Alternatives B and C of the preliminary concept document. Our three justifications follow.

The following comments apply to the block of BLM lands south of the eastern portion of Selawik National Wildlife Refuge. These adjacent BLM-managed lands are bordered to the south by Koyukuk NWR land. Currently, there are State-selected lands within this BLM area as well as several parcels not State selected that will remain under BLM management. We believe that for reasons of efficient management, landscape connectivity, public use, and resource protection, these lands between the two National Wildlife Refuges should remain federal public lands with limited issuance of rights-of-way for development. Supporting information is provided below.

Efficient management: Retaining BLM management of lands in this area will avoid the creation of small, isolated BLM islands surrounded by other lands. Landscape connectivity: Limiting the development that takes place in this slice of land between Selawik and Koyukuk NWRs will allow for greater wildlife usage of the lands and interconnection of the habitat within the two refuges. Large amounts of connected habitat are important in the face of environmental change to enable movement and shifting habitat use that follows shifting ecotypes. See the comments from Kanuti NWR for analyses and suggested methods for implementation. Connectivity models using methods robust to climate change are currently available for BLM to use.

Public use: Federally-qualified subsistence users in rural Northwest Alaska have extremely limited access to land status maps and other tools which can help them know where they are eligible to hunt under federal subsistence regulations. When boundaries or land conveyances create a complicated patchwork of land ownership, this adds to the confusion for rural residents who are the primary users of these lands and impedes their subsistence practices. Maintaining BLM land management between the two National Wildlife Refuges creates a large area of federal public lands, managed similarly, which can be more clearly understood by local users and which would facilitate public use.

Resource protection: As described above, the Selawik River and Kobuk River watersheds are valuable fish habitat. They host the only two spawning areas in the region for sheefish (inconnu). The Kobuk has a significant run of chum salmon, which contributes to the commercial salmon fishery in Kotzebue Sound, and both rivers have sizable populations of whitefish, pike, and burbot. The Selawik River is also of regional importance as a rearing area for juvenile fish due to its rich aquatic environment (Brown 2004). Taken together, these fish resources are vital to the subsistence economy of six villages and the regional hub of Kotzebue. In a 2010 community-based harvest survey, the village of Selawik harvested

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over 500,000 pounds of wild food, and four of the top five harvested resources were fish (ADF&G 2011). These high value fisheries deserve protection from adverse effects from rights-of-way, mining, and other developments on adjacent BLM lands.

The lands to the east and south of Selawik National Wildlife Refuge that fall within the Central Yukon RMP are also habitat for the Western Arctic Caribou Herd, the largest caribou herd in Alaska. These lands include both winter range for the herd as well as outer/peripheral range (Western Arctic Caribou Herd Working Group 2011). The Western Arctic Caribou Herd is a vital subsistence resource for over 25 communities, and protection of its habitat and migratory routes, as well as allowance of a buffer for shifting habitat use in future, is strongly advised for the Central Yukon RMP.

Non-Native and Invasive Species

Similar to subsistence, the issue of invasive species occurs across all five of the preliminary alternative concepts. The threat of invasive species, particularly Elodea, whitesweet clover, and bird-vetch, is so great that the draft EIS should contain a range of alternatives describing differing levels of invasive species prevention, management, and eradication. The Dalton Highway corridor is highly infested with white-sweet clover, and bird-vetch. An area along the Tanana River down from Nenana, near BLM lands, has an Elodea infestation. The past history of spread, and the extreme impacts that could occur to BLM lands or adjacent CSUs, dictate that the issue should not be delayed for a subsequent step-down plan. Kanuti staff recommend that the CYRMP specify invasive species early detection and rapid response, and eradication, if appropriate, as part of every multiple use decision in the RMP.

Minerals (Non-Locatables; Mining, Oil and Gas, Coal, Gravel, Geothermal)

Can the land use plan consider impacts to social impacts to air, water, etc. from permitted activities to the people? Water quality and constant burning is an issue for oil exploration.

Any restrictions should not affect existing mines but the community might be concerned about large scale mining efforts.

What does it mean to open land for mining claims? Discussion about the process of staking a claim and filling a claim. If land is open to mining, are all mining regulations applied to that land and monitored?

Although the alternative matrix is not the place to discuss impacts, in anticipation of alternative impacts review, we suggest the additive and synergistic impacts of repeated permit actions such as placer mining, rights-of-way, and other transportation/development decisions, etc. be fully analyzed within the EIS.

We recommend that thresholds of water quality and quantity be established or defined as part of any mining or transportation activity to be considered for permitting. We recommend that the range of alternatives in the Environmental Impact Statement (EIS) include in the types, levels and intensity of monitoring efforts.

We recommend that BLM define what levels of water quality and quantity thresholds would trigger reduction in these additive cumulative impacts. To this end, the draft EIS should contain an Appendix that includes specific mineral permitting and monitoring guidance in the form of Standard Operating Procedures and Policies and/or Instructional Memoranda. These appendices should define the stringent permitting and monitoring that, in the absence of total mineral withdrawal buffers, would be the only appropriate management actions for areas upstream of a conservation system unit (CSU).

Wilderness

Loss of heritage wild lands and their value/devaluation.

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Wildlife
Fire episodes also have an effect on wildlife habitats. Fire protects allotments but does not protect wildlife areas.
Concerns that the Ambler Road corridor will need to be elevated and this will disrupt the flow of wildlife across the corridor. "Old Man River area" is important for goose and duck hunting.
There could hunting pressure and guides in the Melozi area. Moose is the species. More people are showing up. Most of the hunters are coming by airplane, some jet boats. There is a guide out of Galena that is responsible for a majority of the use. This area should be managed so that the resources are not impacted. No immediate impacts at this time but there is a potential for impacts if the pressure grows more into the future.
Depletion of herd ranges - migration areas.
Reduction of biodiversity.
Another thing to consider is wildlife corridor easements between not necessarily competing areas but area of special wildlife interest like Kanuti Refuge and Arctic Refuge.
If the state were ever to open the corridor to snowmachines and there was high marking on Midnight Dome (area nominated as an ACEC by a Wiseman resident) it would kill the sheep up there. This has happened in the Talkeetna Mountains, the high marking has driven sheep out of their own habitat. Mining doesn't seem to impact anything, it is the OHV winter access and high marking potential.
…just north of Coldfoot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
Adding infrastructure outside this corridor would lessen my enjoyment of this landscape, increase the ever growing network of trails, roads, ruts, powerlines, towers, etc., most of which negatively impact the fragile habitats and highly valuable habitat, fish, and wildlife resources of this area.
Fragmenting the landscape with a patchwork of management strategies, allowed uses, and access would cause confusion among user groups, conflicts among user groups (where currently there are few), loss of important wildlife corridors, reduced resiliency of wildlife to adapt to climate change, and an overall reduction in the quality, quantity, and value of the fish, wildlife, water, habitat, and wilderness resources that are important to me and many Alaskans.
If PLO 5150 is modified, that will result in my and other current user groups losing important and long-standing access to high quality habitat, water, fish, wildlife, and wilderness resources, forever.
Allowing non-local OHV use at any time of the year will negatively impact habitats, wildlife resources, fish resources, users' enjoyment of the area, and hunting season length.

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The Steese Highway hunt is a perfect example of what would happen if OHV's are allowed; the quota of caribou would be harvested in a short period of time by relatively few people who have enough money to buy OHV's and who lack an understanding of the long-term impacts that OHV use has on the land. This also has trickle-down effects on ADF&G and their ability to manage game populations and quality hunting experiences.
The current non-motorized restriction for the Dalton Highway Corridor (PLO 5150) has been adequate and effective for land and resource protection. Establishing RMAs that allow summer OHV use will create unappealing and irreversible damage to sensitive habitat and local game populations.
Recreation Management Areas that allow motorized use and trail proliferation will negatively impact local game populations and create front- and middle country impacts where wild backcountry currently exists. Areas of most popular use (RMAs) will create concentrated access points elsewhere for backcountry hunters, which forces a competition component among them that currently does not exist. Front country and backcountry user groups have competing ideals and expectations; therefore, they require separate and distinct areas to play and/or restrictions on mechanical toys to level the game and lesson the impacts.
The Dalton Highway offers the last remaining road-accessible "general harvest" hunt for caribou: the Central Arctic Herd utilizes this corridor every spring and fall, migrating as far south as Coldfoot and Wiseman and as far east as Arctic Village. This herd has declined 60% in three years, so any disturbance in their range (development or increased hunting pressure) will place stresses on these animals that may severely deplete their numbers.
Sheep in the Central Brooks Range have one protected nursery, and that is the Gates of the Arctic National Park & Preserve. Lands surrounding Gates' borders are targeted by backcountry sheep hunters, with a success rate of less than 35% for those who know the country, have the requisite physical ability and remain persistent. Any proliferation of recreation or access within 5-miles of the Dalton Highway will force hunting competition and user conflicts, and sheep populations will suffer.
Hunting pressure for moose in the CYRMP area is high, and navigable rivers are at full capacity for maintaining healthy moose populations. Liberalized recreation on these lands will be disastrous for moose and moose hunting. Average success rate for moose hunters in general harvest hunt zones of this region is about 38% as it stands, with mixed general season, registration, and draw hunt areas of opportunities. Currently, draw and registration hunts are available west of Hughes to the western CYRMP land boundaries, and navigable river systems receive a relatively set number of hunter groups each season for the past 15 years (the current land use and regulation system is working). These areas cannot support increased hunting or liberalized land use if sport and subsistence hunting is to remain a priority.
Overall, we believe that the significant withdrawals as outlined in Alternative B (12,752,000 acres) would allow for the natural habitat to thrive and maintain diverse wildlife and fish populations for subsistence and recreational hunting and fishing.
With increasing human population, diminishing natural areas, and impacts of climate change, it is incredibly important to assess how development may have negative impacts on wildlife.

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Published research demonstrates the adverse effects of roads on caribou movement (Wilson et al. 2016) and caribou habitat (Wilson et al. 2014, Chen et al. 2017). This is important in relation to the proposed Ambler Road corridor and any other road corridors (e.g., Umiat) that would be developed to access areas with mineral potential. Effects here accrue to not only wildlife, but also subsistence users who rely on wildlife.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.
Somewhere in the "Land and Realty" concept, or below in Concept 3.3 "Lands with Wilderness Characteristics," the BLM should discuss and plan for habitat connectivity. Maintaining habitat connectivity is one of the most important actions managers can take to provide for resilience in the face of climate change, a finding based on an extensive analysis of research and biodiversity planning recommendations made during the past two decades (Heller and Zavaleta 2009). By working together, the BLM, FWS, and the Northwest Boreal Landscape Conservation Cooperative (NWB LCC) have determined that there are BLM lands that deserve special attention because they connect existing CSUs (Magness and Robertson 2016). A relatively small connection spanning BLM lands in between CSUs could be one of the most important and cost effective ways we can allow for climate adaptability as habitat changes may force species' movements across the landscape. It also fills BLM's planning mandate to plan and manage at landscape scales. Thinking proactively about connectivity while our landscape is still largely intact not only could save billions in future costs, but with minimal land designation or special management can maintain the iconic Alaskan landscape for centuries.
We agree with the goal: "Manage ACECs to protect significant resource values and prevent damage to important natural, biological, cultural, recreational, or scenic resources and values or to protect life and safety from natural hazards" (p13); and the objective: "Maintain the long-term sustainability of the relevant and important values for which the ACECs are designated, as well as the scientific opportunities"(p13). We believe that for BLM to be able to achieve the above goal/objective, strong consideration should be given to expanding the boundaries of the Upper Kanuti River Area of Critical Environmental Concern (ACEC), and Ray Mountains/Tozitna River ACEC. If these ACECs cannot be expanded, then BLM should establish two special watershed management areas that: (a) include the entire Kanuti River drainage on BLM lands; and, (b) connects the Ray Mountains/Tozitna River ACEC with the Kanuti NWR boundary and includes the greater Kanuti Kilolitna River drainage, as depicted in the Refuge's first proposed "Kanuti Kilolitna River ACEC." To avoid serious impacts to the fish, wildlife, and habitat resources of Kanuti NWR downstream of BLM lands we urge you to provide the same level of careful upstream watershed management on the Kanuti and Kilolitna Rivers as will be given to the South Fork and Jim Rivers in Alternatives B and C of the preliminary concept document. Our three justifications follow.

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It is clear is that BLM-administered lands are integral to maintaining landscape connectivity among all interior Alaska CSUs and are especially important for providing flow of resources between the Yukon Flats and Kanuti NWRs and the Arctic National Wildlife Refuge and Gates of the Arctic National Park and Preserve (Magness and Robertson, 2016), our specific areas of interest. Using this method, a very small area of BLM lands have a disproportionately large conservation impact. This is one of the best examples of landscape-scale planning and management that we can show on-the-ground outcomes and can gain national notoriety.
Vegetation
There is already a bad infestation of weeds, such as sweet clover, along the Dalton Highway, and this should not be allowed to spread beyond the highway.
Reduction of biodiversity.
Disruption of the carbon sequestering capability of the tundra.
The potential for the harmful effects of CO_2 and methane on climate change if these areas are developed.
Adding infrastructure outside this corridor would lessen my enjoyment of this landscape, increase the ever growing network of trails, roads, ruts, powerlines, towers, etc., most of which negatively impact the fragile habitats and highly valuable habitat, fish, and wildlife resources of this area.
Fragmenting the landscape with a patchwork of management strategies, allowed uses, and access would cause confusion among user groups, conflicts among user groups (where currently there are few), loss of important wildlife corridors, reduced resiliency of wildlife to adapt to climate change, and an overall reduction in the quality, quantity, and value of the fish, wildlife, water, habitat, and wilderness resources that are important to me and many Alaskans.
If PLO 5150 is modified, that will result in my and other current user groups losing important and long-standing access to high quality habitat, water, fish, wildlife, and wilderness resources, forever.
Allowing non-local OHV use at any time of the year will negatively impact habitats, wildlife resources, fish resources, users' enjoyment of the area, and hunting season length.
Allowing OHV use would ruin the wilderness character of the planning area and displace many current users. It would also result in permanent damage to the permafrost-adapted habitats through creation of ruts, erosion, accelerated permafrost thawing, and alteration of local hydrology.
The current non-motorized restriction for the Dalton Highway Corridor (PLO 5150) has been adequate and effective for land and resource protection. Establishing RMAs that allow summer OHV use will create unappealing and irreversible damage to sensitive habitat and local game populations.
Overall, we believe that the significant withdrawals as outlined in Alternative B (12,752,000 acres) would allow for the natural habitat to thrive and maintain diverse wildlife and fish populations for subsistence and recreational hunting and fishing.

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Water and Wetlands
Anything that happens on the Yukon River drainage is a spawning stream. Louden tribe and Galena residents harvest salmon and whitefish as one time or another during the year. The concern is those spawning streams like the Kassan River. So any rivers that flow into the Yukon are important to Galena. The potential for hazardous materials to get into the streams much like the Pebble mine did or what happens in Canada with their mines and how this will affect the Yukon downstream. Drift logs are also very important that come down those rivers to the Yukon. Development might affect these.
We fish at the mouth of the Koyukuk River, we are concerned about the mining off the Hogazta River. Who will police any mining operations where lands are opened up to mining?
Concerns about mining effects on water quality.
Impact on Source water reducing stream health. Both in quality and quantity of streamflow.
I am concerned about the watersheds in the Dalton corridor for watersheds that flow into Kanuti refuge. Things that happen in the headwaters affect the lands below.
In addition, concerned about downstream affects particularly in the Dall River where it flows down into the Yukon Flats. The mouth of the Dall River is a few miles downstream from the village itself. There is private property and allotments. Our family still uses the allotments and we are concerned about the streams around that area where we get our drinking water. Also the Big Salt (??) it's a key spawning area for salmon.
Regarding C & D- expanding for mineral entry to the east of the corridor in the lands toward Venetie, how can you regulate/assure the drinking water and water quality for fish of those waters downstream will not affect the residents of Venetie?
State land selection & mineral entry within this corridor would seriously threaten the water quality of adjacent areas & recreational opportunities along the highway.
…just north of Coldfoot all the way to the Sagavanirktok River past Toolik. This area provides unparalleled wilderness character, quality habitats, and excellent fish and game resources to the common person. Nowhere else in Alaska can a person access the Brooks Range without use of expensive airplanes, be they private, commercial, or charter. This access absolutely must be coveted and protected. This has immense recreational, tourism, hunting, fishing, and camping value. Allowing additional mining and mine exploration in this area would permanently degrade the water, wilderness, fish, and game resources contained within that I deeply value and enjoy and remove the possibility of future generations enjoying the same quality of life we currently have.
If PLO 5150 is modified, that will result in my and other current user groups losing important and long-standing access to high quality habitat, water, fish, wildlife, and wilderness resources, forever.
Allowing OHV use would ruin the wilderness character of the planning area and displace many current users. It would also result in permanent damage to the permafrost-adapted habitats through creation of ruts, erosion, accelerated permafrost thawing, and alteration of local hydrology.
The Refuge Association and Friends would like to see specific water quantity/quality impacts identified with the anticipated levels of mining in each alternative including a discussion of what thresholds would necessitate changes/reductions in permitting requirements.

Table B-3
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In the Central Yukon RMP we ask that BLM place a high priority on the protection of water quality and quantity in watersheds upstream of Conservation System Units (CSUs). We are highly concerned about the potential impacts of mineral and transportation permitting upstream of CSUs and the possibility that these actions could affect maintenance of fish spawning, rearing, and overwintering areas on refuges and federally managed fisheries waters. We urge the BLM to take every measure possible to guarantee that water quality and quantity will be maintained in BLM managed watersheds that feed our refuges and federally-managed fisheries.
We believe that our success in managing the Kanuti National Wildlife Refuge (NWR) habitats to be productive for fisheries and wildlife depends upon the BLM providing the utmost consideration of upstream watershed impacts in the RMP. Withdrawal from mineral entry or in the absence of such withdrawals, extremely stringent permitting, would be required to maintain the currently healthy and productive watersheds that provide contaminant-free biomass production that supports current levels of subsistence and recreational harvests of fish and wildlife every year. We believe that BLM must avoid impacts to water quality and quantity upstream of Kanuti NWR so that habitat productivity and subsistence capability are not reduced. However, without some amount of mineral withdrawals, or highly stringent permitting immediately adjacent to and upstream from Kanuti NWR, it is difficult to see how the first objective would be fully met.
Through the designation of appropriate-sized buffers (e.g., at least one-township-wide, or one HUC 12 unit-long) the BLM can accommodate appropriate and needed development within the "inner corridor" and keep the impacts a reasonable distance from CSU boundaries so that downstream water quality and quantity impacts will be minimized. Similarly, it is the FWS position that alternative D should include retention of the PLO 5150 withdrawal in areas that would form buffers along the CSU boundaries within the Dalton Highway "outer corridor." This recommendation is analogous to land-use zoning at the city, borough, or county scale in the U.S. In similar multi-use context, planners may allow heavy industrial use in one area, mixed use or light industrial adjacent to that, and quiet residential use adjacent to that. In order to avoid land-use conflicts urban planners usually do not intentionally place heavy industrial use immediately adjacent to quiet residential use. We believe that a graduated intensity of development moving away from the CSUs is needed. Furthermore, this zonation should recognize that the connectivity or benchmark areas (see below) should have development avoidance strategies. That would translate into no lifting of PLO 5150 in those areas. In Alternatives C and D, it is difficult to see how BLM could achieve the goals/objectives listed above (p3, p7, p8) if land disposals would be allowed adjacent to a CSU, including Kanuti NWR.
Alternative A (no action) denotes a withdrawal for mineral entry of "Five townships outside the southeast corner of Kanuti National Wildlife Refuge" (pg. 6). We ask that this five-township mineral withdrawal be carried forward into Alternatives B and C, especially if the buffers that we request above, are not provided in the final, approved Central Yukon Resource Management Plan (RMP). This withdrawal has been in place for 30 years, so the relative economic impact of continuing it would not be significant, even in a blended alternative. However, removal of the withdrawal in the absence of designated buffers could constitute significant additional environmental impacts to Kanuti NWR in the form of diminished water quality and quantity and connectivity for wildlife migration and hence may create significantly increased impacts to fisheries and diminished subsistence opportunity.

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The BLM manages watersheds upstream of five interior Alaska National Wildlife Refuges including Yukon Flats, Kanuti, Koyukuk, Nowitna, and Innoko. These National Wildlife Refuges are identified, at least in part, as BEACONS ecological benchmark areas. If upstream areas are protected by BLM for some Refuges, such as Kanuti NWR, then it can serve as a benchmark for BLM monitoring and adaptive management purposes. Protecting these upstream watersheds by maintaining PLO withdrawals will help these refuges meet their refuge purposes related to maintaining water quality and quantity, fulfilling migratory treaty acts with respect to salmon, and for providing for continued subsistence opportunities.
We are extremely pleased with the goal: "Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act ANILCA) and the purposes of the CSU." (p3). We would like Koyukuk NWR also to be named in that goal.
We believe that withdrawal from mineral entry and/or establishment of strong watershed protection measures are essential for Koyukuk NWR to achieve its legal mandates as established by ANILCA (maintain diversity of fish, wildlife and habitats; maintain water quality and quantity; provide for subsistence opportunity; and, fulfil international conservation treaty obligations). In the absence of mineral withdrawals, the RMP should specify which strategies would be used by BLM to maintain water quality and quantity in the event that mineral or transportation permitting may occur.
We would like the BLM to consider it critically important to retain in federal ownership those lands that support high-value watersheds that flow into Koyukuk NWR (as named above: Indian River, Hogatza River, Dakli River, Wheeler Creek, Billy Hawk Creek, N. Fork Huslia River, Dulbi River, and Bear Creek Whakatna Creek).
The early concept alternatives do not adequately recognize the critical importance of watershed health in providing for subsistence, on Koyukuk NWR, and on the BLM lands that surround the refuge. These watersheds form one system, on- and off- the refuge, that people residing in the villages of Hughes, Huslia, Koyukuk, and Galena rely upon. Actions that diminish watershed health will affect the ability of these systems to provide adequate subsistence opportunity. By following our recommendations in the above paragraphs, you will enable the systems to continue to provide for subsistence.
We are extremely pleased with the goal: "Maintain the water quality for downstream CS Us, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU." (p.3) We would like Nowitna NWR also to be named in that goal.
PLO 5150 Alt B or C-Dall River is headwaters into Yukon Flats NWR and Steven's Village. Concerns about changes in water quality impacts. Dall river has hot springs, native allotments. The Dall river traditionally fed the tribe. Waterfowl hunting (canvas backs, pintail, mallard, geese), resident pike population (historically but over fished in the past few years, with the opening of the Haul Road). Important waterway to access resources.
Alternative Concept 3.1 — Locatable Minerals We are extremely pleased with the goal: "Maintain the water quality for downstream CSUs, such as the Kanuti National Wildlife Refuge, to meet the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and the purposes of the CSU (p3). We would like Innoko/Kaiyuh Flats NWR also to be named in that goal.

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Visual Resources
Need for more garbage collection at waysides. Visual impacts and safety concerns with lack of adequate facilities.
The areas around Finger Mountain, Kanuti River Crossing, Beaver Slide, Fish Creek, Arctic Circle Viewpoint, the Forks of Bonanza Creek, & Gobblers Knob are extremely scenic. State land disposals, mining activity, & development in general would distract appreciably from the experience of driving along this wilderness highway.
Our Coldfoot employee has documented a significant increase in winter tourism along the Dalton highway, mainly small tour busses that go from Fairbanks to Coldfoot. The counts of tourists on the Wiseman tour have about doubled every year for the last three years. Our Coldfoot winter visitor center regularly hosts 5—15 people per day. The main winter attractions are aurora viewing and dramatic remote landscapes. These dramatic viewsheds should be protected to avoid significant alteration. As with watersheds, viewsheds must be maintained by careful and stringent mineral or transportation permitting.
Socioeconomics
Rain events have changed the fire regime that has an effect on firefighting jobs which requires folks to rely more on hunting and trapping but the resources are getting thin.
Our kids/grandkids need jobs. If resources can be properly developed and still protect resources, then we are all for it. Creating jobs and making sure there is a way to keep people employed. Most of our interior villages are a dying commodity. We need to be aware of that and make decisions now not to close up those potential opportunities.
Concerns about impacts to culture/social structure with access routes. Concerns about keeping the village culture intact.
How is the state's future development going to affect the BLM managed land and what kind of input can Ruby have, specific to the road to the minerals in the Kobuk area or the Melozi River/Kokrine Hills and the potential for geothermal energy? This is likely going to be important given the cost of energy.
What about the economic cost to maintaining two additional roads. The state doesn't have enough money to maintain what is open now.
It is not in the National interest to allow the State of Alaska selection of any lands in the utility corridor. The Lands the State has proposed for selection are choice oil and gas lands, or gold mineral worth eventually billions of dollars to the Nation.
The loss of the ability to harvest subsistence resources with customary and traditional methods adjacent to these Communities on the Federal Public Lands would place an extremely great hardship on the local residents. I have written this addendum to my oral comments to clarify how the State's request would affect the National Interest and the physical and social welfare of Wiseman and Coldfoot's subsistence users.

Table B-3
Impacts

Any economic development of an area must be fully examined in light of its ability to outlast the value of an area for eco-tourism and value as natural lands for animals. Also looked at in this examination must be the cost of federal and state infrastructure involved in the development of an area. What will the increased cost be to manage an active development? What are the costs of researching and permitting? What will the cost of the infrastructure such as roads and corridor management be. What economic benefit is actually realized from this venture after all the true costs are factored in?
Non-consumptive Tourism: Non-hunting tourism to experience the Dalton Highway drive to Prudhoe Bay is extremely popular (multi-national user groups), and these land users are attracted to the uniquely wild character of this corridor and its wildlife unavailable on this scale anywhere else in Alaska. This industry is a substantial contributor to the state (local and rural) tourism economy, and the perceived value of the future corridor will greatly affect the corridor's actual economic return.
Environmental Justice
Would like us to respect the native people.
Many of the existing mining claims have not been monitored sufficiently.
Public Health and Safety
Does BLM include health impact assessments in the RMP planning process? It never seems to be included in the process.
Environmental Disasters
Inability to mitigate environmental disasters in these remote locations.
Cumulative Impacts
The alternatives matrix is also unclear on how the cumulative impacts of other potential permit actions, e.g., rights-of-way, placer mining, etc. would be addressed.
We recommend that thresholds of water quality and quantity be established or defined as part of any mining or transportation activity to be considered for permitting. We recommend that the range of alternatives in the Environmental Impact Statement (EIS) include in the types, levels and intensity of monitoring efforts.
We recommend that BLM define what levels of water quality and quantity thresholds would trigger reduction in these additive cumulative impacts. To this end, the draft EIS should contain an Appendix that includes specific mineral permitting and monitoring guidance in the form of Standard Operating Procedures and Policies and/or Instructional Memoranda. These appendices should define the stringent permitting and monitoring that, in the absence of total mineral withdrawal buffers, would be the only appropriate management actions for areas upstream of a conservation system unit (CSU).

Table B-4
Baseline Data

Lands and Realty
Corporation lands that are surrounded by federal lands are "locked in" and the land owners in those native lands are land locked. BLM needs to consider this. There is a difference between native allotment owner and native corporation lands. The BLM needs to consider the difference for access for these allotment owners.
What are the current activities and current requests for public lands along the Dalton corridor and lands toward Tanana? Discussion about what these are including larger projects (Ambler Road and AKLNG) as well as smaller realty actions.
As far as the PLO 5150, it seems to me that we've got a pipeline that goes through the Dalton Highway Corridor. Things seem to work well. I can understand the state always wants to get their hands on as much federal land as possible, but I would prefer that the minimal amount of state land is, the minimal amount of the corridor is managed by the state.
On the withdrawals poster online it says that none of the withdrawals in the Central Yukon planning area have been modified since the 1970's and I'm wondering if that is accurate information based upon the other poster that you were showing that showed 8 million acres that were open to locatable mineral entry… (Discussion/explanation from BLM that these are under ANCSA d(1) withdrawals and that many areas recommended under that last RMP were recommended for withdrawal but never were implemented)… I am interested to know where those areas are. (Discussion/explanation from BLM that many of these were just place names and no specific locations so difficult to map).
These lands (Dalton Corridor) are huge asset to BLM for future constituency.
Analysis of Management Situation states most of BLM land within the planning area is withdrawn yet under Alt A it shows there are 8 million acres of land open to locatable mining. These are opposing statements – why?
As noted above in the ALTAA Report, many of the existing 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."
Table 1. Table of the pairs of National Wildlife Refuges and National Parks with modelled landscape linkages and the proportion of land ownership types within the 0.1% landscape linkage design (Magness and Robertson, 2016. Using Geodiversity to Connect Conservation Lands in the Central Yukon, Alaska, Table 3). We recognize that the primary management direction and use of the BLM-administered land in the utility corridor (under PLO 5150) is for energy and transportation; however, the Service believes these purposes can continue to be achieved and still allow for connectivity as has been demonstrated over the past life of the PLO (25+ years).
Lands with Wilderness Characteristics
Specific areas that have outstanding wilderness character include all lands between Coldfoot and the pump station north of Toolik Field Station (where the planning area encounters and includes the Brooks Range), as well as the Finger Mountain area, Ray Mountains, and Hodzana Hills.

Table B-4
Baseline Data

Areas of Critical Environmental Concern (ACECs)
Finally, in areas of ecological ACECs, the existing ones don't show up on the map so the public can't see what is existing today.
We'd like the Bureau of Land Management (BLM) to designate special management areas as well as Areas of Critical Environmental Concern (ACEC). We assert that all contributing streams of the Kanuti River, all stems of the Koyukuk River, headwater stems of the Chandalar river system, Jim, Dietrich, Atigun and the Sagavanirktok rivers, as well as Galbraith and Toolik lakes should be protected to sustain their substantial, intact, undisturbed, and complex contributions to multi faceted and connected ecosystems.
Spooky Valley should be considered for an ACEC because of the presence of near-surface radioactive earth minerals (Uranium), which would be physically disturbed to reach high concentrations of lead and zinc, not to mention silver, tin, tungsten, and bismuth. Spooky Valley and the Ray Mountains need special consideration to prevent land disturbances that have consequential downwind and downstream affects—dispersal of radon and radium dust layers that would affect the entire ecosystem.
ABHA believes each alternative should have special management areas and Areas of Critical Environmental Concern (ACEC) to sustain the best habitat for important species like moose, sheep, caribou, muskox, wolf, grizzly bear, salmon and whitefish; habitat quality and ecosystem integrity; thereby fulfilling the BLM's stated goal to manage lands with wilderness characteristics for size, naturalness, solitude, and outstanding opportunities for primitive and unconfined recreation. Two critical species are sheep and caribou because they are extremely sensitive to environmental changes and increased hunting pressure.
The Ray Mountains and Hodzana uplands deserves special consideration as either ACECs or as part of the proposed BCA to protect the habitat for the resident caribou herds in these two small ranges.
Doyon reiterates these comments here, noting its appreciation for BLM's determination that the Nulato Hills ACEC no longer meets the ACEC criteria and should not be carried forward for analysis in the EIS and BLM's reevaluation of the Dulbi River ACEC.
As reflected in the November 2015 ACEC Report and Alternatives B and C, and severely in the recently-completed Eastern Interior RMP planning process, the tendency of the current round of planning efforts in Alaska appears to substantially favor expansion of ACECs in a way that Doyon believes was never anticipated by the enactment of FLPMA. Doyon accordingly believes that these decisions must be subjected to greater scrutiny—internal and external—as part of BLM's land management planning process.

Table B-4
Baseline Data

The proposed 41,000-acre Accomplishment Creek ACEC was nominated by BLM for crucial Dolly Varden overwintering habitat. ACEC Report, p. 3. The ACEC Report asserts that: "The spring areas in Accomplishment Creek and its tributary, Section Creek, are essential to the survival of Dolly Varden, a species sought as a subsistence and sport fishing resource. Conditions at the springs provide spawning habitat, allow eggs to incubate and hatch, and provide an overwintering refuge for all age classes of fish, from eggs to adults." Accomplishment Creek and Section Creek are two of approximately 35 springs located within 10 drainages that all North Slope Dolly Varden populations depend on for overwintering and spawning. However, spawning has not been documented in either creek within this ACEC. Habitats within the spring areas themselves and downstream can contain all age classes of a Dolly Varden population for overwintering. These habitats can be sensitive to any perturbation that may affect the quantity and quality of under-ice water. Direct disturbance to spring areas could affect all age classes of fish present at the time of disturbance and potentially into the future if multiple age classes are lost, or if perturbations affect water quality and quantity in the long-term. To the extent that there are sensitive and important habitats that qualify for ACEC designation, inclusion of the entire drainage is unlikely to be needed to provide necessary protection for those habitats. The source of water for these springs is the south side of the Brooks Range, so upwelling waters should only be susceptible to perturbations that occur directly at the upwelling locations and downstream. Activity within the drainage outside of the immediate floodplain should have little potential to adversely affect these habitats; however, the entire drainage, including uplands and non-fish-bearing portions of the streams, is included in the ACEC.
When originally established, the Hogatza River ACEC encompassed 5,200 acres of land and was restricted to areas of documented high use salmon spawning habitat, predominantly for chum salmon. The ACEC was multiple separate areas of important spawning habitat. The expansion being carried forward into the RMP EIS expands the ACEC to include several tributaries of the Hogatza River and considerable additional acreage around the middle Hogatza River drainage encompassing the original ACEC, for a total of 60,000 acres. Additional data collected on salmon spawning since the original management plan and ACEC designation support that Aloha Creek, Clear Creek, Bear Creek, High Creek, and Caribou Creek all contain important salmon spawning habitat, primarily for chum salmon, although coho and sockeye salmon spawning also occurs in some areas. However, most of the ACEC expansion surrounding the mainstem Hogatza River does not include any documented salmon spawning habitat and seems unlikely to meet the criteria for designation as an ACEC because it is primarily a migratory corridor.

Table B-4
Baseline Data

Importantly, the ACEC Report and Preliminary Alternatives Concepts also fail to support any finding of a threat of irreparable damage or that certain special management measures are necessary to prevent such damage. The only risk identified in the ACEC Report's discussion of the Accomplishment Creek ACEC appears to be that "[v]isitor use of the Dalton Highway is . . . increasing with improved road conditions" and that, "[a]s a result, populations of Dolly Varden will continue to come under increased sport fishing pressure from anglers accessing the Sagavanirktok River drainage via the Dalton Highway." ACEC Report, p. 3. The ACEC Report further states that, "The lack of overwintering habitat is the major limiting factor to survival for arctic fish species. The springs provide a source of winter flow and small habitat refuges needed for fish survival." ACEC Report, p. 20. But it doesn't identify any threat of irreparable damage to the habitat. Yet, Alternative B specifies the following special management measures for this ACEC: recommended withdrawal from locatable minerals; ROW exclusion; and summer travel management closure. Preliminary Alternatives Concepts, p. 20. Alternative C's proposed special management measures are ROW avoidance within the 100-year floodplain and exclusion in known overwintering habitat or known spawning areas, and limiting travel to designated routes or trails. Id. The documentation, however, includes no showing of irreparable damage and draws no rational connection explaining how the proposed special management measures are necessary to protect the habitat and prevent such damage.
The proposed Alatna River ACEC discussion suffers from the same deficiency. BLM decided to carry forward as the Alatna River ACEC a nomination by the U.S. Fish and Wildlife Service ("USFWS") for approximately 5,500 acres to protect whitefish spawning habitat in the Upper Koyukuk River drainage, identifying in the Preliminary Alternatives Concepts the same special management measures as for the Accomplishment Creek ACEC. ACEC Report, p. 58; Preliminary Alternatives Concepts, p. 20. BLM, however, has neither identified any threat of irreparable damage to this habitat nor explained why these special management measures might be necessary to protect the habitat and prevent such damage. In fact, even BLM's characterization of the USFWS's nomination suggests that special management measures may not be necessary
Generally, ACECs designated for fish, and carried forward for evaluation in the EIS, are all centered on important spawning habitats for either anadromous whitefish or salmon. However, each ACEC extends well beyond the stream reaches used by their respective species and all encompass entire watersheds, including uplands, mountain slopes, and non-fish-bearing waterbodies. Nearly all ACECs nominated for fish include habitats that are already listed in the State of Alaska's AWC such that each already receives statutory habitat protections under AS 16.05.871, the Anadromous Fish Act.
The considerable proposed expansions of existing ACECs, including the Galena Mountain Caribou ACEC, Ray Mountains ACEC, and Jim River ACEC for caribou habitat also raise important questions. BLM has determined to carry forward for analysis in the EIS several significant ACEC expansions to protect caribou habitat, including a 26-fold expansion of the Galena Mountain Caribou ACEC from 19,400 acres to 507,000 acres, an eight-fold expansion of the Ray Mountains ACEC from 191,600 acres (Tozitna Subunits North and South) to 1,540,000 acres, and expansion of the Jim River ACEC from 203,000 acres to 303,000 acres. These are expansive swaths of land that BLM has proposed be withdrawn locatable mineral entry (for moderate- to high-potential and other areas), excluded from ROW location, and subject to certain travel management restrictions. Preliminary Alternatives Concepts, pp. 18-20. Yet the Galena Mountain Caribou ACEC expansion was discussed in a mere page worth of text and the Ray Mountains ACEC in a page and a half in BLM's ACEC Report. ACEC Report, pp. 85-86, 92-93.

Table B-4
Baseline Data

BLM, in its ACEC Report and Preliminary Alternatives Concepts, fails to explain how including additional habitat in new ACECs and imposing the special management measures identified in the Preliminary Alternatives Concepts will help protect crucial caribou habitat, particularly given the reasons that BLM and others have identified for any population limitations or declines. In the discussion of the Galena Mountain Caribou ACEC, BLM states that the Galena Mountain Caribou Herd "size is approximately 125 animals and is in decline due to low recruitment and calf survival." ACEC Report, p. 92. A 2015 ADF&G Caribou Management Report on the Galena Mountain, Ray Mountains, Wolf Mountain, Hodzana Hills herds similarly concluded that "[p]oor survival due to predation is likely the primary factor restricting herd growth." ADF&G Caribou Management Report, pp. 13-7 – 13-8. Yet, in the next sentence after attributing the population decline to a low natural increase in population and predation, BLM states, "Therefore, the BLM recommends that the ACEC boundaries be expanded to include BLM-managed lands within the core range of the Galena Mountain Caribou Herd." ACEC Report, p. 92. The connection between the cause and recommendation, and then the proposed special management measures in the Preliminary Alternatives Concepts, is not at all clear.
The Galena Mountain Caribou ACEC discussion also mentions that the nominated area meets the ACEC criteria for the Wolf Mountain Caribou Herd, but it omits any specific discussion of the status of that herd or any threats to its population. The most recent estimate of the population of the Wolf Mountain Caribou Herd is between 300 and 500 animals. Harper, P., and L. A. McCarthy, eds. Caribou management report of survey-inventory activities 1 July 2012-30 June 2014, ch. 13 (ADF&G 2015), available at http://www.adfg.alaska.gov/index.cfm?adfg=wildliferesearch.smr20154 ("ADF&G Caribou Management Report"). Most of the Wolf Mountain Caribou Herd occupies State land. The Ray Mountain Caribou Herd is estimated at approximately 1,850 animals, and the Hodzana Hills Herd at 1,107. Mager, 2012 [Mager, K. H. Population structure and hybridization of Alaskan caribou and reindeer: Integrating genetics and local knowledge. PhD. Dissertation. University of Fairbanks, Alaska. 215 pp.].
It appears to Doyon that, in nominating these ACECs, BLM has moved from designating ACECs for the Galena Mountain, Wolf Mountain, and Ray Mountain Caribou Herds based on calving grounds to designating them based on the core population distribution of the herds, given that calving grounds are dispersed. Particularly given the large size of the proposed ACECs relative to herd sizes, BLM should provide information for public review and comment regarding the specific criteria that BLM used to select the boundaries of these and other ACECs being proposed to protect crucial caribou habitat. BLM should explain whether the ACEC boundaries were established based on dispersed calving areas alone, year-round core use areas, all known use areas, or all known and potential use areas. Moreover, Karen Mager's (2012) research on the genetics of Alaskan caribou herds suggests that although the Galena Mountain and Wolf Mountain herds were genetically distinct, perhaps because of a genetic bottleneck, the Ray Mountains and Hodzana Hills herds, while mountain ecotypes, were not genetically differentiated from the adjacent tundra ecotypes, such as the Western Arctic, Central Arctic, and Porcupine herds. BLM should explain how this genetic information was used to inform its decision on proposed ACEC boundary definitions.
The use of raptors to designate ACECs is inappropriate. As noted previously, the objective of the ACEC designation is to highlight areas where special management attention is needed to protect and prevent irreparable damage to fish or wildlife resources, among other elements. Thus, in addition to meeting the relevance and importance criteria to be designated as an ACEC, an area must require special management attention to protect the relevant and important values. Without special management attention, there is no ACEC.

Table B-4
Baseline Data

Any ACEC designation or expansion should be directed and tailored to address some real need for protection of or prevention of irreparable damage to an important and relevant resource, and not simply expand habitat without any rational basis for concluding that setting aside additional habitat will result in protection of that resource.
BLM's decisions must be grounded in scientific evidence and reflect a rational connection between this evidence and the decisions ultimately made.
The existing Jim River ACEC encompasses those portions of the Jim River (and Prospect Creek) upstream from the Dalton Highway Utility Corridor. The existing ACEC encompasses primarily rearing habitat for juvenile Chinook salmon; however, spawning for Chinook and chum salmon is listed in the AWC upstream from the Dalton Highway crossings. The existing ACEC also appears to encompass Grayling Lake and its outlet stream to the Jim River, which is an important spawning drainage for Arctic grayling. While some spawning does occur in these upper areas, surveys conducted along the pipeline right-of-way identified the majority of Chinook and chum salmon spawning was downstream from Prospect Camp to the confluence with the South Fork Koyukuk River. This portion of the drainage is encompassed by the expanded ACEC. More than 50 percent of the existing Jim River ACEC, upstream from the Dalton Highway Utility Corridor, including the upper Jim River and upper Prospect Creek, is not cataloged for use by salmon and in Prospect Creek, Chinook salmon spawning is only documented upstream of the Dalton Highway approximately 0.5 miles. However, the expanded ACEC encompasses the entire Jim River drainage, including all uplands and non-fish-bearing headwater streams. It is unlikely that the entire drainage, including all uplands, would require special management to protect the important spawning reaches of the river. Moreover, while the lower Jim River below Prospect Creek is important spawning habitat for Chinook and chum salmon, it is unclear what special management may be required in addition to ADF&G statutory protections for these habitats to ensure that their habitat values are maintained and why.
The DRAFT Central Yukon RMP continues violating federal law by nominating the addition of hundreds of thousands of acreage into areas of critical environmental concern (ACEC) and research natural areas (RNA). Very little of the 13 million acres of Bureau of Land Management (BLM) lands within the Central Yukon RMP planning area would not qualify under the relevance and important criteria found in 43 CFR 1610.7-2, BLM Manual 1613, or 43 CFR 8223 as ACEC or RNAs. Congress was well aware of that fact when they include Section 101(d) in ANILCA;
AMA has previously offered comments on ACECs in general and extensive comments on specific ACEC proposals being considered for the Central Yukon RMP. AMA would like to incorporate those comments in response to the proposals being considered in the alternatives. (See letter dated August 29, 2014).
For the Ray Mountains/Ishtalitna ACEC area, we understand the Ray Mountains Caribou Herd relies on the entire landscape from the calving ground in the Ray Mountains all the way to the south portion of Kanuti National Wildlife Refuge, the latter important to residents of Allakaket as a subsistence resource.
All proposed and expanded ACEC's should undergo further review ensuring ACEC criteria is met prior to advancing to specific alternative development.
In the case of the Hogatza ACEC, lands managed by the BLM have been reduced to 10% of the original ACEC. The State of Alaska now manages 96% of the watershed in question. This ACEC and others like it with reduced acreages should be re-visited for elimination of the ACEC designation.

Table B-4
Baseline Data

Reviewing the original list of 25 ACEC's in the original plan we've noticed that over the life of the plan only 7 ACEC management plans were ever developed. Since special management measures are required to meet the definition of an ACEC, and apparently, there was not enough concern by the agency to even write a management plan, do these other ACEC's actually meet the criteria as an ACEC? Perhaps not.
Further review of all ACEC's for possible elimination is needed prior to advancing to alternative development.
All ACEC's should receive further review ensuring they meet ACEC criteria prior to development of the final alternatives.
We recommend BLM maintain the Existing Galena Mountain Caribou ACEC. The existing ACEC correctly prioritizes calving grounds of the Galena Mountain Caribou and an expansion of the ACEC will dilute the effective priority of that important habitat, which has already been designated. This area is not accessible by OHV; therefore, it is unclear why the proposed OHV restrictions are necessary. If intended for those under BLM permit, the plan should clarify.
Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the existing Dulbi River ACEC; therefore, the ACEC is unnecessary and should not be carried forward into the draft plan. Identified wildlife use patterns are very low, as is use of the area by the public. Since the DM812 permit hunt was established in 2004, an average of 31 permits were issued annually. An average of 74% of permittees did not hunt, and an average of five moose were harvested annually over the 12-year period. An average of 1.7 hunters harvested 0.5 moose annually on the RM834 permit in Unit 21C. The remoteness of the area is self-regulating.
Spooky Valley RNA/ACEC, Ray Mountains/Tozitna River ACEC, Upper Kanuti River ACEC This is a combined comment to address similar concerns regarding the proposed Spooky Valley/Ray Mountains/Upper Kanuti River ACECs. Patterns of public use are very low in the Spooky Valley area; therefore, the area should not be designated an ACEC given the limited impacts and need for special management. In fact, hunters may be the only known users of the area. Hunter use and harvest are self-regulating due to the remoteness and limited landing sites for aircraft (see table below). Use of the four small non-migratory herds listed below is not significant enough to warrant access restrictions based on wildlife resource use or potential habitat damage concerns. The BLM should support research to identify and prioritize calving ground identification for the Ray Mountain and Hodzana Hills herds. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area.

Table B-4
Baseline Data

Use is limited on the Upper Kanuti drainage, primarily to within 1 mile and less of the Dalton Highway by summer fishermen, and provides a unique recreational opportunity for a short section given the extensive length of river. Special management needs, such as safe vehicle pullouts at river crossings, do not need a special designation to be improved; those actions can be justified under current management. Use at the Kanuti River crossing does not justify needing special management, which is required for ACEC designation. Fewer than 4 hunt groups/year use the Kanuti River access at the DHCMA for hunting moose or caribou. Radio-collaring studies of moose have demonstrated there were no substantial migrations between the DHCMA, GAAR, or KNWR (Joly et al. 2015). Radio-collaring studies of the Ray Mountains and Hodzana Hills caribou did not document exchange between the two herds but did document that the herds had a strong fidelity to their respective home ranges (Horne et al. 2014). Dall sheep radio-collaring studies conducted in Unit 24A showed strong fidelity to home ranges as well (Brainerd, 2014). Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. Designation of this area as an ACEC is not justified and therefore unnecessary, given lack of identifiable and realistic resource concerns. See also the combined comment for Spooky Valley, Ray Mountains/Tozitna River, and Upper Kanuti ACECs below.
The South Fork Koyukuk River ACEC is identified as a ROW avoidance area; however, it is transected by the Bettles Road. High use in this crossing does not justify the need for special management, which is required for ACEC designation. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area; therefore, designation of this area as an ACEC is unnecessary.
No wildlife concerns have been identified for the Sulukna River ACEC. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The remoteness of this area is self-regulating and does not justify the need for special management, which is required for ACEC designation. For years 2012 through 2016, an average of 20 hunters have harvested 13 moose annually in the entire Upper Nowitna Drainage, including the Sulukna drainage. This level of moose harvest is well below the limits for sustainable harvest. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and therefore unnecessary.
The Upper Teedriinjik (Chandalar) ACEC ROW avoidance area conflicts with RS2477 winter routes to state lands. In the original ACEC Report (Table 3), BLM found that this proposed ACEC met fisheries/riparian criteria but did not meet the wildlife criteria. We concur with that conclusion and question whether the inclusion for wildlife values is an error. If intentional, we request BLM provide new information and the relevance and importance analysis that supports its inclusion. If not, designation of this area as an ACEC for wildlife values is not justified and therefore unnecessary.
Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the proposed Hogatza River Tributary/Indian River ACECs; therefore, there is no need to designate the areas as ACECs. Hunter use patterns are very low. Since the DM889 permit hunt was established in 2004, an average of 52 permits were issued annually. An average of 51% of permittees did not hunt, and an average of 11 moose were harvested annually over the 12-year period. An average of 29 hunters harvested 6 moose annually on the RM834 permit in Unit 24C and 24D.
Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, Dall sheep or other wildlife have not been identified in the proposed Jim River ACEC.

Table B-4
Baseline Data

The Jim River ACEC avoidance area contains the Bettles Road, and under Alternative B, the popular camp sites and roads near Jim River would be unnecessarily closed to summer travel as well as the Gobblers Knob to Prospect Creek gravel road. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and is therefore, unnecessary.
Alatna River ACEC Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The Alatna River ACEC conflicts with an RS2477 winter route. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and is therefore unnecessary.
Lake Todatonten Pingos RNA/ACEC The remoteness of this area is self-regulating. In addition, existing environmental laws and regulatory authorities would mitigate resource impacts to soil, water and vegetation, absent a designation. Given the lack of identifiable and realistic resource concerns, it appears this ACEC is not justified and therefore unnecessary.
In regulatory year 2009-2010 (RY09), guided nonresidents harvested 2 sheep within the Dalton Highway Corridor Management Area (DHCMA) in Unit 26B; and (RY10) guided nonresidents harvested 2 sheep within the DHCMA in Unit 24A. Guided nonresident sheep hunters had not reported harvesting sheep within the DHCMA prior to 2009. The ACEC nominations appear to relate to competition concerns among the local residents of Wiseman and Coldfoot (who also qualify as subsistence hunters on federal lands), nonlocal residents, and guided nonresident hunters in this area, which does not meet the criteria for ACEC identification or need for special management to protect important and relevant values.
Galbraith Lake ACEC While Dall sheep do use small portions of Galbraith Lake for lambing and spring foraging, we do not consider this to be critical habitat. According to the 2009 BLM report "Dall Sheep Use of ACECs in the Utility Corridor Management Area, Alaska," the previously identified mineral lick did not have signs of recent use, and no other mineral licks were identified. The Utility Corridor RMP noted "This area is currently withdrawn from mineral location and entry as part of the inner Corridor. No mineral withdrawal specific to mineral licks is necessary at this time." Both Alternative B and C now recommend withdrawal from locatable minerals for the entire ACEC as well as any mineral licks. There appears to no wildlife-related need for this ACEC or the associated proposed withdrawal as special management.
The proposed Midnight Dome/Kahalbuk ACEC near Wiseman includes winter and summer habitat for sheep that spend at least part of the year in GAAR (Arthur 2014, Schmidt et al. 2012, Schmidt et al. 20 13).

Table B-4
Baseline Data

First, in the final delineations of the Upper Kanuti River ACEC and Ray Mountains/Tozitna River ACEC, it appears that perhaps only a handful of years of radio-collar location data were used to define the calving grounds of the Hodzana and Ray Mountains Caribou Herds, respectively. We ask whether a few years of collar data comprise an adequate sample for making a long-term, 20—30-year, planning-level decision. We would suggest that extent of calving and wintering areas are probably better defined on multi-decadal scales. We understand that agencies are rarely able to fund decades of collar data for small caribou herds; therefore, BLM should consult similar data spanning longer time periods obtained for other herds elsewhere. For example, with the larger well known herds in Alaska that have long-term collar data (e.g., Porcupine Herd, PCH, and Western Arctic Herd, WAH), the habitat-use footprint defined by several decades of collar data is usually much greater than one defined by only a few years of collar data (PCMB 2016). We also know that studies using other techniques, such as shed antler distribution and weathering pattern, have shown much wider ranges than are currently known with collar data (Miller et al. 2013).
Looking at the long-term history of most montane caribou herds of interior Alaska, it appears that extent of both calving and winter ranges have varied significantly over time. We therefore recommend you consider the recent collar demarcated area of the Upper Kanuti River ACEC as only a minimal representation of calving range for the Hodzana Herd. For the Ray Mountains/Tozitna River ACEC area, we are familiar with movements of the Ray Mountains Caribou Herd. We have documented that they rely on the entire landscape, from the calving ground's center in the Ray Mountains all the way to the lichen-rich southern portion of Kanuti NWR. The latter area provides Allakaket with an important caribou subsistence hunting opportunity, especially when Western Arctic Caribou cannot be found near the village (see Holen et al. 2012; Note: there are special provisions in the ADFG and Federal subsistence regulations recognizing this hunt. FWS and local village TEK observations indicate regular and significant use of the habitats along the Ray Mountains/southern Kanuti Refuge transition). Therefore, we recommend that you revise both boundaries by providing an adequate buffer that more likely encompasses the long-term usage area, allows for "climate smart" adaptation, including range shifts, and enhances village food security into the future. For caribou habitat protection an ACEC, or special management area, should specify measures, such as mining withdrawals and limited transportation corridor development, because these development activities have been shown to have significant impacts on caribou movements and productivity elsewhere in Alaska (Nellemann and Cameron 1996, Cameron, Dau 2015).
Brown (2009) identified an important spawning area for Humpback Whitefish (*Coregonus pidschian*) and Least Cisco (*Coregontts sardinella*) on the Kanuti River about six miles downriver from the FWS-BLM boundary along the Refuge's east side. Similar spawning activity for those two species also occurs on the Kanuti NWR along the South Fork Koyukuk just downstream of the refuge's east boundary (Brown 2009). Spawning whitefish (of unknown species) have also been observed in the upper Kanuti River east of the Dalton highway (L. Bartlett, pers. comm.). BLM proposes significant fisheries protection measures for the South Fork, but the current range of alternatives do not take similar action for the Kanuti River. The Kanuti and South Fork River watersheds are both major contributors of Broad and Humpback Whitefish and Least Cisco to the upper Koyukuk River system (Brown 2009). Brown et al. (2007) documented anadromous behavior of whitefish collected in the upper Koyukuk drainage, including from this Kanuti River spawning reach, with a portion of their life cycle spent 1,600 km downriver in estuarine areas near the mouth of the Yukon River. The State of Alaska Anadromous Fish Catalog lists the Kilolitna River as an anadromous fish stream (due to spawning Chinook Salmon), but does not include the Kanuti River upstream of the Kilolitna confluence. This information is in the process of being updated (Jimmy Fox, Randy Brown, USFWS Fairbanks, pers. comm.), so the entire Kanuti River may be classified by the State of Alaska as an anadromous fish stream before the draft RMP is completed.

Table B-4
Baseline Data

The upper Koyukuk River villages of Allakaket, Alatna, and Hughes have long shown a high degree of subsistence reliance upon fish, particularly salmon and whitefish (Nelson, et al. 1982, Anderson 2007, Holen et al. 2012, Wilson and Kostick 2014). Anderson (2009) specifically mentioned the mouth of Kanuti River as a significant whitefish subsistence harvest fishing camp used by the people of the upper Koyukuk River. As well, Anderson (2007) identified multiple whitefish harvest areas along the main stem Koyukuk River between the mouth of the Kanuti River and the village of Allakaket. Brown (2009) identified important whitefish overwintering habitat in deep water holes in the Koyukuk River mainstem between the Kanuti River mouth and Allakaket, along the middle section of the Kanuti River, and along the lower South Fork Koyukuk. He also identified important summer rearing areas in the river-connected wetlands of the Kanuti Flats. Koyukuk River villagers pursue whitefish in summer with set-nets, in fall by seining, and in early winter with under-ice nets and traps. This is a critical food resource for the village residents because of its much greater temporal availability, compared to salmon.
Spatial analysis. We recommend a comprehensive spatial analysis that includes ranking/scoring of important values that should weigh into making final decisions on land management options in a given watershed. BLM did this for fisheries values and vulnerabilities, mineral potential and certainty of developments, but such an analysis should be taken further to evaluate other important characteristics that should influence selection of management options. In a simplistic example, each watershed could have up to a maximum of 100 points (point weighting of each characteristic could be equal, as in this example, or could be varied, based on other qualities (e.g., legal obligations that BLM deems important). • High-value fisheries — 10 points • 100-year floodplain —10 points • Lands with wilderness characteristics — 10 points • ACEC nomination — 10 points • Upstream from CSU — 10 points • Migration/connectivity corridor — 10 points • Important subsistence harvest area — 10 points • Recreational value designation, SRMA, ERMA, etc. — 10 points • Unique habitat — hot springs, river bluffs, mineral licks — 10 points • Outstanding viewshed — 10 points TOTAL (if each characteristic ranks 10) up to 100
Recreation Management Areas
Melozitna (reached critical mass hunter populations in 2001). Receives between 9-15 groups each season. Twenty two years ago caribou could be found on this upper corridor during September, they are not observed today. This area is rich with earth minerals, gold, and other undisclosed fortunes, but the river is intact and serves as an important source of moose and recreation for locals and non-locals.
Tozitna, Big Salt, and the Ray rivers have critically low moose densities and cannot support even minimal hunting pressure. These rivers receive fewer than 3 groups combined each year.
Kanuti River cannot support increased hunting activity from road, air, or guide/DIY operations. The upper river section receives <12 hunting groups annually (upstream of the CUA). Whitefish have been observed near the Dalton Highway during September, and this species needs protection from mining and aggressive recreation.

Table B-4
Baseline Data

South Fork Koyukuk receives considerable airboat and jetboat traffic with fly-in access from the headwaters, and it cannot support increased recreation or hunting activities. This river also has active mining with gross violations of land use (driving large heavy equipment in the river where salmon and whitefish spawn.)
North Fork Chandalar River to the headwaters of the "Sag" over to the upper Your Creek drainage gets hunted hard by guides, air operators, locals, and backcountry sheep hunters from the road (cannot support increased activities).
Atigun River receives anywhere from 100-300 visitors each season, with sheep and caribou hunting topping the interest. This river corridor is beginning to show signs of high use, and it is the most popular river corridor for accessing the upper Sagavanirktok for sheep and caribou hunting.
The DHCMA extends 5 miles either side of the Dalton Highway and under state hunting regulations, this is an archery only area. The DHCMA and BLM lands overlap; and federally-qualified hunters can use rifles for hunting on federal lands under federal regulations. In addition, bag limits and seasons differ in that the state hunting regulations have a bag limit of one ram, full curl or larger during Aug. 10-Sept. 20 and federal subsistence hunting regulations have a bag limit of one ram, 7/8 curl or larger during Aug. 10—Sept. 20. Also, federally-qualified hunters may also hunt within Gates of the Arctic National Park (GAAR) for 3 sheep during Aug. 1-Apr. 30.
In Unit 26B, during RY06-RY10, ADF&G estimated that a total of 2 sheep were harvested by Wiseman and Coldfoot residents (federally qualified subsistence hunters) using rifles. The number of hunters from these 2 communities was 3-6 annually during RY06-RY08; with no hunters in RY09 and RY10. During the same time period, an additional 14 sheep were harvested (~ 3 sheep annually) by a combination of nonlocal residents and by 2 nonresidents. These 14 sheep were taken by bow and arrow.
In Unit 24A, during RY06-RY10, ADF&G estimated that a total of 9 sheep (~ 2 sheep annually) were harvested by Wiseman or Coldfoot residents (federally qualified hunters) using a rifle. The number of hunters from these 2 communities was 3-5 annually. During the same time-period, an additional 10 sheep were harvested (2 sheep annually) by a combination of nonlocal residents and by 2 nonresidents. These 10 sheep were taken by bow and arrow.
For moose hunting from 2009 to 2013 in the DHCMA, 20 permits were issued annually north of Slate Creek and 50 permits were issued south of Slate Creek. Of those permits, annual averages included 14 hunters killed 2 moose annually and 31 hunters killed 3 moose annually, in the two areas respectively.
Our Coldfoot employee has documented a significant increase in winter tourism along the Dalton highway, mainly small tour busses that go from Fairbanks to Coldfoot. The counts of tourists on the Wiseman tour have about doubled every year for the last three years. Our Coldfoot winter visitor center regularly hosts 5—15 people per day. The main winter attractions are aurora viewing and dramatic remote landscapes. These dramatic viewsheds should be protected to avoid significant alteration. As with watersheds, viewsheds must be maintained by careful and stringent mineral or transportation permitting.

Table B-4
Baseline Data

Off-Highway Vehicle and Travel Management
I think there was an assumption made in some of the material about rights of ways and making sure that you do consider rights of way exclusion areas and rights of way corridors. There was an assumption that BLM would have a Road to Ambler in alternative B, C or D. Now you want to analyze if there was a road to Ambler what would be the alternatives, but BLM shouldn't assume there would be a road to Ambler. The EIS hasn't started and it would prejudice that process. Similarly the road to Umiat is dead. It is no longer a state project and there other resources at stake there.
When did the state top file the lands? It is an important question. 25 year time frame to top file. The timeframe for top filling could determine if they could legally top file. ANILCA statute is clear that (State Selections and Conveyance, Section 906 of ANILCA) section J, Clarification of Lands Outside of Units-Future state selections pursuant to statehood act…gives various public lands orders and 5150 is one of those lands orders that says specifically shall remain unavailable for future state selection and that excluded them from top filing because they were…in 5150 they were withdrawn and it refers to the statehood act. Statehood Act was even more conservative about lands for right of ways. PLO 5150 is a utility corridor, a right of way. BLM is really pushing on outer edge of letting state top file on lands that ANICLA specifically called out that could not be selected. I am concerned that BLM is opening themselves up for violation of ANILCA. Concerned that solicitors for BLM have not been consulted on statutory restrictions and determine when state top-filed. From Coleen River to the NW, specific places were state could file for properties. In 1971 the state did not apply for Dalton corridor. In ANILCA it is specific to not allowing new conveyance.
Overland winter moves for equipment is very expensive. Anaktuvuk looking an area just south of the corridor identified for the Road to Umiat.
Discussion of snow road through state lands that work for overland travel.
Hinkel Highway is a good route to the north.
Generally use ARGO for travel over landscape.
Snowmachine to Nuiqsut.
Much discussion about lack of ability for allotment holders to travel through Gates of the Arctic National Park to get to allotments in the summer.
Subsistence Use, Traditional Use Areas
Travel to get resources are now restricted to less than 30 miles from town, the pressure/competition from the big boats from outside hunters and the combined trash/waste is a problem and makes the longer trips not viable.
Kateel River is an important river for trapping (in BSWI planning area).
Old Man, Ray Mountains, Crater Lake are important hunt areas. John River, Hunts Fork is important for Sheep hunting.
Suggestion that the ASAP traditional use area information that was collected previously should be reviewed.

Table B-4
Baseline Data

Our ancestors went up the Hunts Fork (?) up the Anaktuvuk and hunt up Old Man and go all the way to Ray Mountains. My grandpa would hunt up by Crater Lake. Right now we still live off the land but do have a cash economy for gas and oil (gas is expensive here). We have to go a long ways by boat to get our food. It can be very expensive.
Second question, in regard to subsistence, is BLM talking about federal subsistence authority or state subsistence authority? Make this clear.
Looking at history, we need to keep in mind and be concerned about subsistence and hunting access. Those hunting grounds are traditional and important. (Areas identified were the state of Alaska lands to the NW of Venetie and the lands immediately in the 5150 corridor).1 million acres. Another million acre block area just on the south edge of the Brooks toward the area near Toolik.
Conveyance to the state of Alaska in 1993 for the development node in Coldfoot (Marion Creek) was not statutory. How did this happen? This is the best moose hunting in the valley and this state development node really hurt this area. It is now a sport hunting area with no subsistence access.
BLM needs to review the Carol Scott subsistence study for traditional use areas from 1991-1992 (published in 1993) and the state subsistence studies in consideration for the resources.
The lands the State has selected around Wiseman typically are where a large percentage of moose, some sheep and some years many caribou, along with many of the grouse and water fowl, as well as a very large percentage of fuel wood. Access to these resources is on the Nolan, Hammond and Wiseman roads with highway vehicle in the dry season and with snowmobile in winter.
Subsistence uses and harvest areas are well documented by Carol P Scott in 1992/93 published in 1998 as: "Invitation to Dialogue: Land and Renewable Resource Use Over Time In Wiseman, Alaska" Technical Report NPS/CCSOUW/NRTR-98-D3 NPS D-31. Ms. Scotts study was partially funded by BLM. Note Wisemon Subsistence use areas Map 6 page 181 occurring on BLM lands.
The Alaska Department of Fish and Game Subsistence Division did another Subsistence uses and mapping study of Wiseman/ Coldfoot in 2011. Published as Technical Paper NO. 372, "Subsistence Harvest and Uses of Wild Resources by Communities in Eastern Interior Alaska, 2011" David Holen, Sarah M. Hazell Koster. Note mapping of intensive subsistence use areas on BLM lands pages 342- 383)
Circles done on hunting areas (look at map picture)-chandler and to foothills. In July/ August.
We believe BLM should consider the entire Kanuti drainage to be a "high value" watershed. Similarly, in the Ishtalitna Creek/Ray Mountains/Tozitna area, we recommend that BLM consider the entire Kilolitna River watershed as "high value." We recommend that the Central Yukon RMP describe the specific means BLM will use to guarantee no diminishment of water quality and quantity due to BLM permitting actions in the upstream areas that feed Kanuti NWR via the Kanuti and Kilolitna Rivers. This is of critical importance in order to continue to support the whitefish and salmon populations of the Kanuti Refuge. In the village of Hughes, Wilson and Kostick (2014) determined that a majority of subsistence resources harvested by weight was fish, a pattern that has continued since 1982, albeit at lesser amounts recently. Similarly, recent ADFG Subsistence studies clearly document the continued reliance by the people of Allakaket and Alatna on the fish resources of the Kanuti NWR region (Holen et al. 2012; also see recent data for Allakaket to be provided to BLM by Dr. Annette Watson, 2016).

Table B-4
Baseline Data

A recent oral history recording (Steven Bergman, long-time Allakaket resident, 23 March 2015, on file at BLM) documented Allakaket peoples' historical subsistence hunting and fishing activities on the BLM lands east and south of Kanuti NWR. Formal western scientific subsistence studies, as far back as 1982 (Nelson et al.), identified the main Kanuti Flats as important for subsistence harvest of fish, waterfowl, moose, and beaver, and that their use extended upriver as far as Olson Lakes along the Kanuti River east of the Dalton Highway. More recent studies have documented that this pattern of reliance continues to exist to this day (Holen et al. 2012, Wilson and Kostick 2014; also see recent data for Allakaket to be provided to BLM by Dr. Annette Watson, 2016).
We describe our subsistence concerns throughout this document. We recommend that a separate alternatives concept be developed to address subsistence activities and impacts because the BLM lands play such an important role in providing for subsistence. Furthermore, if not managed properly, decisions made in this RMP would not only impact subsistence capabilities on BLM lands but also on adjoining CSUs. Foremost to consider relative to potential lifting of the PLO 5150 withdrawal is its impact on subsistence opportunity. The rural priority could be diminished in areas where it is critical to some villages. BLM should have a goal of making sure there is not a confusing pattern of varying state/federal jurisdiction in critical subsistence areas.
We recommend retaining the PLO which withdrew the Venetie Block from locatable mineral entry to include all lands east of the Dalton Highway, from the Yukon River Bridge to mile marker 170 and those BLM-administered lands located adjacent to the Yukon Flats northern refuge boundary and east to Venetie to protect headland waters flowing into the Yukon Flats NWR and to protect subsistence resources and traditional and cultural lands of Stevens Village and Venetie residents. This includes an important fall chum spawning area that is critically important to subsistence.
Climate Change
In the last 15 years of maintaining weather data, it is rare for a full 12 inches of freeze down to occur. This is an unreasonable restriction, BLM should reconsider the freeze down for lands. Agricultural depth of 4 inches is more typical.
Snow blows too much to guarantee 6 inches of snow cover. Snow cover is getting later each year.
With increasing pressure to develop this area, the BLM should collect at least ten years of future data to model predevelopment baselines for soil depth and condition, permafrost depths and condition, thaw rates, complete catalog of watershed chemistry, climate spectrums of temperature and precipitation, riparian vegetation chemistry, lichen health and chemistry, not forgetting game population trends and public land use patterns.
Finally, the Service appreciates the objective to manage lands for sustained resource needs. Management plans assist in maintaining fish and wildlife populations within their habitats, and must be flexible to address the fluctuations of fish and wildlife habitat factors, including climate change, and human use (e.g., hunting, fishing and recreation) that can vary from year to year. Please describe the flexible nature of the management and how natural and climate related changes will be integrated into the decision making process.

Table B-4
Baseline Data

Cultural Resources
Eliza Jones has a traditional place names/dictionary document (Koyukon Athabascan Dictionary (J. Jette and E. Jones, 2000, Alaska Native Language Center, Univ. of AK, Fairbanks) that BLM should review. Eliza interviewed elders for traditional place names. BLM should also follow up with Eliza to look at these.
Looking at the southern portion of the Dalton Corridor, near the Yukon River. Stevens Village council created a traditional use plan and this incorporates a large portion of the corridor. This plan has ethnic geographic place names of important locations both historical and currently used. Under FLMPA, tribal traditional plans are supposed to be considered for compatible uses. There is a lot of cultural resource areas and not all are inventoried, sacred sites and burial sites. Elders want these protected and inventoried but remain confidential.
Toolik Lake and Galbraith lake have historical sites- to the west, there are ancient burial grounds.
The Mesa and Putu sites are two major complexes known to have been occupied as far back as 11,000 BC, and the latter is within a day's walk from the Dalton Highway. Our members are aware of sites that have not been officially recognized by BLM and could easily be located within a future RMA or mining site.
We would like BLM to report their findings of human use, past and present, before this process goes any further. This data could help guide BLM's course for Locatable Minerals, Lands and Realty, Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, Recreation Management Areas, and Backcountry Conservation Area selections.
Cultural resources could use further development in the CYRMP process based on original data collection from Tribal governments and traditional ecological knowledge. The theme of cultural resources should be broad and include traditional lands, along with customary use areas. The affected environment baseline need to consider wild resources gathering camps, harvest zones and recognized trails and trap-lines.
Important cultural and historical values on BLM lands south of the Selawik River should be considered due to the area's long standing use as a travel route and as a site of international trade between the Selawik inupiat and Koyukon Athabascan peoples, dating from before European contact (Burch 2005). We have heard detailed stories from Selawik elders regarding trading exchanges that would take place with Athabascan trading partners near the area of Purcell Mountain. Conservation of these lands due to these values, whether through an ACEC or another type of special management designation, should be considered by BLM during this planning effort.
Additionally, the Pah River and Pah River flats are areas of cultural importance for the upper Kobuk inupiat with many old sites and stories (Magdanz 2007). We believe that these cultural values, along with the rich habitat for birds, fish, and small mammals, justify its possible protection within an ACEC. The Pah River is directly upstream of the Kobuk River sheefish spawning area, and the Pah is also likely a spawning area for humpback whitefish and other fish species. These considerations should weigh in any permitting decisions or the designation of an Ambler Road right-of-way by the CY RMP.

Table B-4
Baseline Data

Fish
Middle Fork Chandalar important for chum salmon spawning, grayling and burbout.
I would like to see BLM land east and north of Galena (specifically Bear Creek) protected from any large scale development because of its importance for subsistence. The area is an important area for hunting and trapping for the residents of Galena. It is also a documented King Salmon spawning stream.
Kanuti River cannot support increased hunting activity from road, air, or guide/DIY operations. The upper river section receives <12 hunting groups annually (upstream of the CUA). Whitefish have been observed near the Dalton Highway during September, and this species needs protection from mining and aggressive recreation.
Brown (2009) identified an important spawning area for Humpback Whitefish (Coregonus pidschian) and Least Cisco (Coregontts sardinella) on the Kanuti River about six miles downriver from the FWS-BLM boundary along the Refuge's east side. Similar spawning activity for those two species also occurs on the Kanuti NWR along the South Fork Koyukuk just downstream of the refuge's east boundary (Brown 2009). Spawning whitefish (of unknown species) have also been observed in the upper Kanuti River east of the Dalton highway (L. Bartlett, pers. comm.). BLM proposes significant fisheries protection measures for the South Fork, but the current range of alternatives do not take similar action for the Kanuti River. The Kanuti and South Fork River watersheds are both major contributors of Broad and Humpback Whitefish and Least Cisco to the upper Koyukuk River system (Brown 2009). Brown et al. (2007) documented anadromous behavior of whitefish collected in the upper Koyukuk drainage, including from this Kanuti River spawning reach, with a portion of their life cycle spent 1,600 km downriver in estuarine areas near the mouth of the Yukon River. The State of Alaska Anadromous Fish Catalog lists the Kilolitna River as an anadromous fish stream (due to spawning Chinook Salmon), but does not include the Kanuti River upstream of the Kilolitna confluence. This information is in the process of being updated (Jimmy Fox, Randy Brown, USFWS Fairbanks, pers. comm.), so the entire Kanuti River may be classified by the State of Alaska as an anadromous fish stream before the draft RMP is completed.
The upper Koyukuk River villages of Allakaket, Alatna, and Hughes have long shown a high degree of subsistence reliance upon fish, particularly salmon and whitefish (Nelson, et al. 1982, Anderson 2007, Holen et al. 2012, Wilson and Kostick 2014). Anderson (2009) specifically mentioned the mouth of Kanuti River as a significant whitefish subsistence harvest fishing camp used by the people of the upper Koyukuk River. As well, Anderson (2007) identified multiple whitefish harvest areas along the main stem Koyukuk River between the mouth of the Kanuti River and the village of Allakaket. Brown (2009) identified important whitefish overwintering habitat in deep water holes in the Koyukuk River mainstem between the Kanuti River mouth and Allakaket, along the middle section of the Kanuti River, and along the lower South Fork Koyukuk. He also identified important summer rearing areas in the river-connected wetlands of the Kanuti Flats. Koyukuk River villagers pursue whitefish in summer with set-nets, in fall by seining, and in early winter with under-ice nets and traps. This is a critical food resource for the village residents because of its much greater temporal availability, compared to salmon.

Table B-4
Baseline Data

We believe BLM should consider the entire Kanuti drainage to be a "high value" watershed. Similarly, in the Ishtalitna Creek/Ray Mountains/Tozitna area, we recommend that BLM consider the entire Kilolitna River watershed as "high value." We recommend that the Central Yukon RMP describe the specific means BLM will use to guarantee no diminishment of water quality and quantity due to BLM permitting actions in the upstream areas that feed Kanuti NWR via the Kanuti and Kilolitna Rivers. This is of critical importance in order to continue to support the whitefish and salmon populations of the Kanuti Refuge. In the village of Hughes, Wilson and Kostick (2014) determined that a majority of subsistence resources harvested by weight was fish, a pattern that has continued since 1982, albeit at lesser amounts recently. Similarly, recent ADFG Subsistence studies clearly document the continued reliance by the people of Allakaket and Alatna on the fish resources of the Kanuti NWR region (Holen et al. 2012; also see recent data for Allakaket to be provided to BLM by Dr. Annette Watson, 2016).
Another of Selawik Refuge purposes is to conserve fish and wildlife populations and their habitats; sheefish and salmon were among the resources named in ANILCA as populations to conserve. The waters and watersheds named above are upstream of the two documented spawning areas for sheefish in the Kobuk-Selawik population (Alt 1987, Underwood 2000, Hander et al. 2008, Saveride 2010). These are critical habitat areas as they are the only spawning areas for this population of sheefish, which is a vitally important subsistence resource in the region. Preservation of water quality and quantity through mining exclusions or stringent permitting conditions is essential for the Refuge to conserve these fish populations.
Alternative Concept 3.1 - Locatable Minerals Objectives The Service appreciates the stated objective to maintain water quality for Conservation System Units (CSUs) located downstream of BLM lands and prospective mineral development; highlighting that ecological systems do not end at geographic boundaries. Fish in the CYRMP are an important subsistence resource for communities in the region. We note that unmitigated mineral extraction practices that have potential to degrade a healthy fishery, such as excessive sediment transported downstream, are inconsistent with the Alaska National Interest Lands Conservation Act (ANILCA), and hinder several legally-mandated purposes of CSUs (e.g., National Wildlife Refuges and National Parks) within the region.
We are submitting as part of these comments some recent information from our summer chum salmon telemetry study that highlights the importance of fish spawning habitat in numerous tributaries and the mainstem of the Koyukuk River (Figure 3). This figure shows the importance of watersheds within BLM lands (e.g., Billy Hawk Creek, Hogatza River, Indian River, Gisasa River), and other Koyukuk River areas downstream of watersheds managed by BLM. (Note: Figure 3 represents the first full year of a multi-year study. Data for 2016 show similar pattern, but analyses are pending, Frank Harris, USFWS, OSM, Anchorage, AK, unpubi. data).
Figure 3. Spawning site distribution of summer chum tagged in lower Koyukuk R, 2015.
Minerals (Non-Locatables; Mining, Oil and Gas, Coal, Gravel, Geothermal)
What is the potential for oil and gas in this area? The maps don't show this.
Question about Mineral Occurrence and Development Report. Request to see the report when it is done.

Table B-4
Baseline Data

Wild and Scenic Rivers
The upper 168-mile segment of the Selawik River was designated as a Wild River in ANILCA to be managed under the Wild and Scenic Rivers Act. The pertinent remarkable values of this river that have been identified for protection are subsistence uses and hydrologic value, including clean drinking water (USFWS 2011).
Wildlife
Caribou traditionally migrated from the south not the north, from the Alaska range and wintered between Huslia and Koyukuk. This was in the early 1900's. There are no longer caribou in the area, just a small herd called the Ruby herd but no one hunts them. The first moose taken was in the 1930's.
Important species are caribou, moose, king, silver and red salmon and whitefish. Crater Lake and the Ray Mountains are important for caribou.
There was way too many people hunting Moose last year on the Melozitna river.
260,000 caribou migrate through Venetie lands… running through the slip of BLM managed lands that point toward Venetie.
Discussion about Sukapak as a sheep area. BLM biologist explains that the data isn't showing enough minimum count points to suggest a mineral lick. Comment from public that there is fall usage just below the tree line and there is a low grade mineral lick there. A lot of rams use that in the fall time. Local residents see them. Concurrence from others that it is visible and additional use across on the west side of the road corridor as well.
Caribou are now 40-50 miles away. They don't come near Anaktuvuk anymore.
We have multiple concerns around the negative Impacts from guided hunting in our area: A) High grading of bulls affecting herd genetics and future strength of the population B) Fewer moose in the area making getting moose for subsistence more expensive and difficult C) Wanton waste of moose meat
Melozitna (reached critical mass hunter populations in 2001). Receives between 9-15 groups each season. Twenty two years ago caribou could be found on this upper corridor during September, they are not observed today. This area is rich with earth minerals, gold, and other undisclosed fortunes, but the river is intact and serves as an important source of moose and recreation for locals and non-locals.
Tozitna, Big Salt, and the Ray rivers have critically low moose densities and cannot support even minimal hunting pressure. These rivers receive fewer than 3 groups combined each year.
With increasing pressure to develop this area, the BLM should collect at least ten years of future data to model predevelopment baselines for soil depth and condition, permafrost depths and condition, thaw rates, complete catalog of watershed chemistry, climate spectrums of temperature and precipitation, riparian vegetation chemistry, lichen health and chemistry, not forgetting game population trends and public land use patterns.

Table B-4
Baseline Data

Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the existing Dulbi River ACEC; therefore, the ACEC is unnecessary and should not be carried forward into the draft plan. Identified wildlife use patterns are very low, as is use of the area by the public. Since the DM812 permit hunt was established in 2004, an average of 31 permits were issued annually. An average of 74% of permittees did not hunt, and an average of five moose were harvested annually over the 12-year period. An average of 1.7 hunters harvested 0.5 moose annually on the RM834 permit in Unit 21C. The remoteness of the area is self-regulating.
Spooky Valley RNA/ACEC, Ray Mountains/Tozitna River ACEC, Upper Kanuti River ACEC This is a combined comment to address similar concerns regarding the proposed Spooky Valley/Ray Mountains/Upper Kanuti River ACECs. Patterns of public use are very low in the Spooky Valley area; therefore, the area should not be designated an ACEC given the limited impacts and need for special management. In fact, hunters may be the only known users of the area. Hunter use and harvest are self-regulating due to the remoteness and limited landing sites for aircraft (see table below). Use of the four small non-migratory herds listed below is not significant enough to warrant access restrictions based on wildlife resource use or potential habitat damage concerns. The BLM should support research to identify and prioritize calving ground identification for the Ray Mountain and Hodzana Hills herds. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area.
Use is limited on the Upper Kanuti drainage, primarily to within 1 mile and less of the Dalton Highway by summer fishermen, and provides a unique recreational opportunity for a short section given the extensive length of river. Special management needs, such as safe vehicle pullouts at river crossings, do not need a special designation to be improved; those actions can be justified under current management. Use at the Kanuti River crossing does not justify needing special management, which is required for ACEC designation. Fewer than 4 hunt groups/year use the Kanuti River access at the DHCMA for hunting moose or caribou. Radio-collaring studies of moose have demonstrated there were no substantial migrations between the DHCMA, GAAR, or KNWR (Joly et al. 2015). Radio-collaring studies of the Ray Mountains and Hodzana Hills caribou did not document exchange between the two herds but did document that the herds had a strong fidelity to their respective home ranges (Horne et al. 2014). Dall sheep radio-collaring studies conducted in Unit 24A showed strong fidelity to home ranges as well (Brainerd, 2014). Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. Designation of this area as an ACEC is not justified and therefore unnecessary, given lack of identifiable and realistic resource concerns. See also the combined comment for Spooky Valley, Ray Mountains/Tozitna River, and Upper Kanuti ACECs below.
No wildlife concerns have been identified for the Sulukna River ACEC. Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in this area. The remoteness of this area is self-regulating and does not justify the need for special management, which is required for ACEC designation. For years 2012 through 2016, an average of 20 hunters have harvested 13 moose annually in the entire Upper Nowitna Drainage, including the Sulukna drainage. This level of moose harvest is well below the limits for sustainable harvest. Given the lack of identifiable and realistic resource concerns, designation of this area as an ACEC is not justified and therefore unnecessary.

Table B-4
Baseline Data

Unique wildlife habitats that provide migration or important habitats for specific life history needs for moose, caribou, or other wildlife have not been identified in the proposed Hogatza River Tributary/Indian River ACECs; therefore, there is no need to designate the areas as ACECs. Hunter use patterns are very low. Since the DM889 permit hunt was established in 2004, an average of 52 permits were issued annually. An average of 51% of permittees did not hunt, and an average of 11 moose were harvested annually over the 12-year period. An average of 29 hunters harvested 6 moose annually on the RM834 permit in Unit 24C and 24D.
The proposed Poss Mountain, Snowden Mountain, Nugget Creek, and Sukapak Mountain ACECs receive use primarily during 1 Aug – 20 Sept during the general Dall sheep seasons due to existing statutes and regulations. However, that relatively limited human use has little biological effect on sheep during the fall because adults are in prime condition and lambs are fully mobile. Sheep are not significantly affected by low elevation disturbance on mineral licks from hunters.
In regulatory year 2009-2010 (RY09), guided nonresidents harvested 2 sheep within the Dalton Highway Corridor Management Area (DHCMA) in Unit 26B; and (RY10) guided nonresidents harvested 2 sheep within the DHCMA in Unit 24A. Guided nonresident sheep hunters had not reported harvesting sheep within the DHCMA prior to 2009. The ACEC nominations appear to relate to competition concerns among the local residents of Wiseman and Coldfoot (who also qualify as subsistence hunters on federal lands), nonlocal residents, and guided nonresident hunters in this area, which does not meet the criteria for ACEC identification or need for special management to protect important and relevant values.
In Unit 26B, during RY06-RY10, ADF&G estimated that a total of 2 sheep were harvested by Wiseman and Coldfoot residents (federally qualified subsistence hunters) using rifles. The number of hunters from these 2 communities was 3-6 annually during RY06-RY08; with no hunters in RY09 and RY10. During the same time period, an additional 14 sheep were harvested (~ 3 sheep annually) by a combination of nonlocal residents and by 2 nonresidents. These 14 sheep were taken by bow and arrow.
In Unit 24A, during RY06-RY10, ADF&G estimated that a total of 9 sheep (~ 2 sheep annually) were harvested by Wiseman or Coldfoot residents (federally qualified hunters) using a rifle. The number of hunters from these 2 communities was 3-5 annually. During the same time-period, an additional 10 sheep were harvested (2 sheep annually) by a combination of nonlocal residents and by 2 nonresidents. These 10 sheep were taken by bow and arrow.
For moose hunting from 2009 to 2013 in the DHCMA, 20 permits were issued annually north of Slate Creek and 50 permits were issued south of Slate Creek. Of those permits, annual averages included 14 hunters killed 2 moose annually and 31 hunters killed 3 moose annually, in the two areas respectively.
Galbraith Lake ACEC While Dall sheep do use small portions of Galbraith Lake for lambing and spring foraging, we do not consider this to be critical habitat. According to the 2009 BLM report "Dall Sheep Use of ACECs in the Utility Corridor Management Area, Alaska," the previously identified mineral lick did not have signs of recent use, and no other mineral licks were identified. The Utility Corridor RMP noted "This area is currently withdrawn from mineral location and entry as part of the inner Corridor. No mineral withdrawal specific to mineral licks is necessary at this time." Both Alternative B and C now recommend withdrawal from locatable minerals for the entire ACEC as well as any mineral licks. There appears to no wildlife-related need for this ACEC or the associated proposed withdrawal as special management.

Table B-4
Baseline Data

The Poss Mountain ACEC area currently provides the only summer overland access to state lands east of the Dalton Highway in T. 31 N., R. 9 W., Fairbanks Meridian. We request that this area remain open to OHV in the summer. Very few sheep inhabit Poss Mountain.
Priority caribou habitat is used to determine management under Alternative B; however, the maps provided simply show "caribou habitat." There is no information as to what constitutes "priority caribou habitat," where this habitat is located, or the size of the priority caribou habitat area. We disagree with labeling caribou winter range or caribou calving as priority habitat.
…one area that has been accurately identified as important for caribou is a migration corridor to calving grounds for the Galena Mountain herd, which is located downstream of McAntee Creek, south of the Melozitna River and north of the Yukon River. The Wolf and Galena Mountain herds show strong home range fidelity.
Radio-collaring studies of moose have demonstrated there are no substantial migrations between the DHCMA, Gates of the Arctic National Park and Preserve, or the Kanuti National Wildlife Refuge (Joly et al. 2015).
Radio-collaring studies of the Ray Mountains and Hodzana Hills caribou did not document exchange between the two herds but did identify that the herds had a strong fidelity to their respective home ranges (Horne et al. 2014).
Dall sheep radio-collaring studies conducted in Unit 24A showed strong fidelity to home ranges of ewes, and no travel corridors between existing federal conservation units were identified (Brainerd, 2014).
Additionally, the BLM map should show sheep habitat (winter and summer) extending north of GAAR as far as there are foothills and into the Castle Mtn, Fortress Mtn "island" of GAAR.
First, in the final delineations of the Upper Kanuti River ACEC and Ray Mountains/Tozitna River ACEC, it appears that perhaps only a handful of years of radio-collar location data were used to define the calving grounds of the Hodzana and Ray Mountains Caribou Herds, respectively. We ask whether a few years of collar data comprise an adequate sample for making a long-term, 20—30-year, planning-level decision. We would suggest that extent of calving and wintering areas are probably better defined on multi-decadal scales. We understand that agencies are rarely able to fund decades of collar data for small caribou herds; therefore, BLM should consult similar data spanning longer time periods obtained for other herds elsewhere. For example, with the larger well known herds in Alaska that have long-term collar data (e.g., Porcupine Herd, PCH, and Western Arctic Herd, WAH), the habitat-use footprint defined by several decades of collar data is usually much greater than one defined by only a few years of collar data (PCMB 2016). We also know that studies using other techniques, such as shed antler distribution and weathering pattern, have shown much wider ranges than are currently known with collar data (Miller et al. 2013).

Table B-4
Baseline Data

Looking at the long-term history of most montane caribou herds of interior Alaska, it appears that extent of both calving and winter ranges have varied significantly over time. We therefore recommend you consider the recent collar demarcated area of the Upper Kanuti River ACEC as only a minimal representation of calving range for the Hodzana Herd. For the Ray Mountains/Tozitna River ACEC area, we are familiar with movements of the Ray Mountains Caribou Herd. We have documented that they rely on the entire landscape, from the calving ground's center in the Ray Mountains all the way to the lichen-rich southern portion of Kanuti NWR. The latter area provides Allakaket with an important caribou subsistence hunting opportunity, especially when Western Arctic Caribou cannot be found near the village (see Holen et al. 2012; Note: there are special provisions in the ADFG and Federal subsistence regulations recognizing this hunt. FWS and local village TEK observations indicate regular and significant use of the habitats along the Ray Mountains/southern Kanuti Refuge transition). Therefore, we recommend that you revise both boundaries by providing an adequate buffer that more likely encompasses the long-term usage area, allows for "climate smart" adaptation, including range shifts, and enhances village food security into the future. For caribou habitat protection an ACEC, or special management area, should specify measures, such as mining withdrawals and limited transportation corridor development, because these development activities have been shown to have significant impacts on caribou movements and productivity elsewhere in Alaska (Nellemann and Cameron 1996, Cameron, Dau 2015).
Water-dependent mammals such as beaver and moose, and waterfowl rely on healthy flows of quality water. The interactions of herbivory and nutritional recharge from riparian flooding in combination with browsing activity are important to the nutrient regime of willow ranges that have been studied for moose (Kielland and Osborne, 1998, Kielland and Bryant 1998, Butler et al. 2007, Butler and Kielland 2008), and also beaver (Moen et al. 1990).
As with fish and mammals, waterfowl depend on a healthy and natural water regime that is best provided by watersheds maintained for water quality, quantity, and connectivity. Kanuti NWR was established mainly because it is a highly productive waterfowl nesting and brood-rearing area. Brna and Verbrugge (2013) reported that "In Alaska, the most productive waterfowl habitats are those that have dynamic nutrient systems that produce seasonally rich plant and animal foods for birds... The productivity of waterfowl habitats of inland-interior regions are also based on dynamic nutrient systems primarily associated with river basin wetlands and floodplains. Within the extensive watersheds of large rivers, nutrient flux (largely nitrogen and phosphorus) is driven by stream erosion, in-stream transport, and by seasonal flooding." Spindler et al. (in prep) documented the relationship of seasonal water regime to fertile re vegetation of sedge meadows that comprise the most productive brood-rearing areas for Greater White-fronted Geese in the nearby lower Koyukuk River floodplain. Heglund (1992) studied the importance of seasonal nutrient inputs to refresh and subsidize primary productivity and the development of aquatic invertebrates in floodplains that provide important forage for duck species using large wetland basins of the Yukon Flats.

Table B-4
Baseline Data

We request clarification why 26,800 acres of the upper Sagavanirktok River was excluded from the Accomplishment Creek ACEC designation. The explanation provided by the BLM is that areas within the Service's nomination that meet the criteria for the Soil, Water, and Fish categories are included in the Accomplishment Creek nomination. However, there are wildlife and scenic values, and additional riparian values in the Sagavanirktok River itself that are not contained in the Accomplishment Creek ACEC, notably: Dali sheep lambing habitat and the recreational and water quality values of the main stem of the Sagavanirktok River. Furthermore, this area has been documented as a migration corridor for the Central Arctic Caribou Herd (Nicholson et al. 2016, PLoS ONE 1 1(4):e0150333), which likely contributes to the popularity of this area for recreational and subsistence hunting (few other areas are as easily accessible to hunters without aircraft transportation). The herd has recently undergone a significant decline, prompting the Alaska Department of Fish and Game to take measures to reduce the harvest of this herd. The justification submitted by the Service in the original proposal is still valid; this is an important area for Dall sheep habitat, wildlife viewing, caribou hunting, fishing, and other wildlife-related recreation. The Service recommends that the western boundary of the Accomplishment Creek ACEC be moved westward to be contiguous with the eastern boundary of the Toolik RNA so as to include all areas of high scenic, wildlife, and aquatic values. If this change is not made, then we recommend that other measures, such as stringent permitting requirements, be taken to maintain the value of this area for caribou migration, Dali's sheep lambing range, and human recreation.
Urban planners generally do not intentionally place conflicting land uses immediately adjacent to one another. Similarly, the BLM CYRMP land use plan should strive for graduated intensities of development moving away from Conservation System Units like Koyukuk NWR. We suggest that BLM recognize the importance of habitat connectivity corridors between Koyukuk NWR and Kanuti NWR to the northeast, to Nowitna NWR to the southeast, and to Innoko NWR to the south. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.
Urban planners generally do not intentionally place conflicting land uses immediately adjacent to one another. Similarly, the BLM CYRMP land use plan should strive for graduated intensities of development moving away from Conservation System Units like Nowitna NWR. We suggest that BLM recognize the importance of habitat connectivity corridors between Nowitna NWR and Koyukuk NWR to the northwest, and with Denali NP to the southeast. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.
We suggest that BLM recognize the importance of habitat connectivity corridors between Innoko/Kaiyuh Flats NWR and Koyukuk NWR to the north and Nowitna NWR to the east. Connectivity corridors should be mapped in the RMP draft and should be proposed to remain in federal ownership. The Northwest Boreal Landscape Conservation Cooperative has provided multiple options for the BLM to prioritize among to reach this objective.

Table B-4
Baseline Data

Soil Resources
With increasing pressure to develop this area, the BLM should collect at least ten years of future data to model predevelopment baselines for soil depth and condition, permafrost depths and condition, thaw rates, complete catalog of watershed chemistry, climate spectrums of temperature and precipitation, riparian vegetation chemistry, lichen health and chemistry, not forgetting game population trends and public land use patterns.
Vegetation
With increasing pressure to develop this area, the BLM should collect at least ten years of future data to model predevelopment baselines for soil depth and condition, permafrost depths and condition, thaw rates, complete catalog of watershed chemistry, climate spectrums of temperature and precipitation, riparian vegetation chemistry, lichen health and chemistry, not forgetting game population trends and public land use patterns.
Invasive plants are a critical concern along the Dalton Highway.
Water and Wetlands
Akaman Lake/old squaw lake; middle fork Chandalar- mining camp; water set in containment and then it broke. How can BLM assure this would not happen in the future?
With increasing pressure to develop this area, the BLM should collect at least ten years of future data to model predevelopment baselines for soil depth and condition, permafrost depths and condition, thaw rates, complete catalog of watershed chemistry, climate spectrums of temperature and precipitation, riparian vegetation chemistry, lichen health and chemistry, not forgetting game population trends and public land use patterns.
Socioeconomics
There are unique tourism values in this (Dalton) corridor as an accessible place for people to appreciate wild country. It's not being managed for its wilderness characteristics but it's being managed not as a commercial sold off to lots of companies to have lots of little or big operations along the highway. It would be a big change to our strongest growing economy in Fairbanks right now to greatly change the Dalton corridor and not manage it for all its uses including wilderness and scenic values.

Table B-5
Backcountry Conservation Area

Alaska Backcountry Hunters & Anglers (ABHA) would like to see connectivity of a single BCA adjoining Areas of Critical Environmental Concern (ACECs) and Arctic National Wildlife Refuge, Kanuti National Wildlife Refuge, Koyukuk National Wildlife Refuge, Yukon Flats National Wildlife Refuge, Nowitna National Wildlife Refuge, and Gates of the Arctic National Park & Preserve to prevent fragmentation of lands with quality habitat (all current federal lands within the CYRMP).
ABHA believes a BCA designation would represent the most responsible and viable decision the BLM will make to fulfill its goals to: 1) protect, conserve, restore, and enhance larger areas of generally intact and undeveloped BLM-managed lands that contain functional, un-fragmented habitats and migration/movement corridors for recreationally-important fish and/or wildlife species, and 2) provide for high-quality wildlife-dependent recreation associated with those species, such as hunting, fishing, trapping, and wildlife watching in the portion of the area under consideration where management of wildlife and recreation can both be enhanced.
The Ray Mountains and Hodzana uplands deserves special consideration as either ACECs or as part of the proposed BCA to protect the habitat for the resident caribou herds in these two small ranges.
ABHA recommends considering lands between MP 70 to MP 170 as the "lower" proposed BCA. This would connect backcountry landscapes between Kanuti NWR and Yukon Flats NWR, as well as ensure special management of the Ray Mountains and Hodzana caribou herds and ranges.
We recommend that all lands north of Dalton Highway MP 240 to MP 300 be designated as the "upper" proposed BCA, which connects Gates of the Arctic National Park & Preserve to Arctic National Wildlife Refuge. This area naturally embodies what is a Backcountry Conservation Area. This option would be the best guaranteed protection for the sheep and caribou populations in this corridor
Our members would like to see the proposed BCA to be somehow connected between the upper and lower sections. We understand the need for some development and infrastructure, so compromises and various alternatives options could help shape this proposal into something agreeable to all land users.
We urge BLM to consider protecting the Ray Mountains and Hodzana Hills by including them entirely within a BCA to protect local caribou populations that range on these lands.
We request that a connective belt of Backcountry Conservation Area be created to join all neighboring National Park and Refuge borders and include the Dalton Highway Corridor (PLO 5150).
Instead of identifying these sites and developing land decisions around some of them, we urge the BLM to champion a vast BCA that ensures protection of our lands with cultural resources so that primitive artifacts may be found by future generations.
Backcountry Conservation Area Designating the Dalton Highway Corridor and Central Brooks Range In accordance with the Bureau of Land Management (BLM) Instructional Memorandum 2017-036 (IM 2017-036), please accept this proposal to establish backcountry conservation management for lands being considered for disposal, withdraw, or transfer that contain priority habitats for recreationally important fish and wildlife species, that provide high-quality wildlife-dependent recreation opportunities afforded by those species, and which meet the designation criteria for Backcountry Conservation Areas (BCAs.)
These lands appear to meet every designation criteria described by Attachment 1—Backcountry Conservation Management: Criteria and Guidance (Ref. 1610, 1110, 1120, 8320, (210, 230, 250) P.

Table B-6
Process-Related

Extension Requests
Developed through an extended time frame given the tribes additional time to respond with traditional knowledge in formation and traditional lands identified.
I respectfully request 60 additional days for comments on the Preliminary Alternatives Concepts for the Central Yukon Plan.
ABHA requests a one-year extension or delay of this process to allow one or more rounds of alternatives for public comment. Since a Backcountry Conservation Area is being proposed, we'd also ask for more time to shape this proposal with GIS mapping tools and language, which requires some time and collaboration with other organizations and the public.
Public Outreach
Please send a copy to Sec. of Int. Ryan Zinke!
The comment period is flooded by a vocal majority who don't live there, not by the silent majority who don't even know about it.
Spend time in the communities more than a day if possible. Consider asking "given we have little capacity, how can we best use our time to work with you?"
Important to loop back and let folks know what you did with their comments.
Involve village leadership on teleconferences.
Please notify me when the mineral occurrence and development report related to this RMP is released.
Discussion about why the utility corridor is not part of the North Slope. Questions about who BLM is meeting with for the utility corridor and North Slope communities.
Did BLM participate in the meetings for the road to Tanana? (Discussion) Many of these issues were hashed out in the road meetings, BLM needs to talk with ADOT to get those issues. Eventually if the road comes on the village side of the Yukon, there will be some concerns.
Doyon shareholder representing Doyon, concerns that there was not enough notice for meetings. Request that BLM provides more notification earlier.
How is the state's future development going to affect the BLM managed land and what kind of input can Ruby have, specific to the road to the minerals in the Kobuk area or the Melozi River/Kokrine Hills and the potential for geothermal energy? This is likely going to be important given the cost of energy.
Simplify the graphics, anything that you can do to simplify them will help understanding.
Do you have plans to go to the village of Rampart (Discussion, about previous conversation with village administrator and meeting at TCC conference). It's good for the residents to know not just the village council.
This is Chad Hutchison on behalf of State Senate Majority members Sen. Bishop and Sen. Coghill. This is a follow-up to the voice message that was just left at (907) 474-2253. We're looking for any transcripts of the comments and presentation that will likely occur tonight at the Morris Thompson Center in Fairbanks.
Venetie is concerned that they were never notified about BLM lands opened to mining and were never involved to make comment and these areas impact water quality.

Table B-6
Process-Related

Question if BLM has gone to Arctic Village and if BLM will come back to Venetie.
I'm also concerned that several communities with a great deal of BLM-managed land surrounding them have not been afforded a meeting to discuss the Preliminary Alternatives Concepts. These communities include Hughes, Huslia, Kaltag, Rampart and Nulato.
The launch of the new BLM website has been problematic, with information being inaccessible for unknown reasons periodically.
Given the "patch work quilt" of land ownership patterns within the area of the Central Yukon simplifying the graphics would be very helpful.
I would suggest making the legends boxes larger and on one side or the other from top to bottom. The lettering of other conservation areas was too small to be readily apparent.
Rather than one map that shows everything several or overlays of or for each alternative would be worth considering.
There is a lot of jargon being used that becomes lost in the verbiage if not explained or graphically shown. For example Research Natural Areas. Name them and show where they are located and what values they have as RNA's.
Special recreation management areas and areas of critical environmental concern, name them and show them graphically. Maybe a side bar to explain why they are important and what their present use pattern is would be helpful.
Stony Valley was shown on several maps but it was not clear what its significance is or what is intended for it or even current usage patterns?
The preliminary nature of this review and comment opportunity, and the short time provided for by BLM between the meetings and the comment due date, makes it difficult for Doyon and other interested parties to provide meaningful input at this time on the development of alternatives.
AOC recommends that the Preliminary Alternatives offered for the Central Yukon RMP be withdrawn and a new Draft RMP/EIS be released for public scoping and comment that is consistent with the compromise that the U.S. Congress intended with the passage of ANILCA.
The BLM needs to continue their rural community outreach in the current phase of developing alternatives.
BLM issued notices to announce scheduled public meetings, however, despite our requests to also announce the availability of the PAC and associated review opportunity, no additional notice was issued.
The home page of the CYRMP planning website also focused primarily on the public meetings. Neither the home nor meeting pages provided links to the PAC or indicated that comments were being accepted outside attendance at the public meetings.
Despite the State's role as a cooperating agency, the PAC was posted without the State's knowledge and without an opportunity to review or discuss the substantive provisions of the document before its release. We therefore do not agree with the statement in the PAC that the State worked with the planning team to develop the document's content (page 1, section 2).

Table B-6
Process-Related

It is also not possible for anyone to meaningfully comment on alternatives that propose LWC management because there were no associated maps indicating which lands would be managed for LWC, nor explanation for any of the LWC alternatives, including 11 million acres in Alternative B, and 5 million acres Alternative C.

The maps provided were well done as they show a lot of data. The following recommendations would make them more useful.
 	
• Increase font size for the community names
• Increase font size in the title block
• Show the Dalton Highway on all maps (good reference point)
• Show communities on all maps
• Change the color of the military and the ACEC lands to make them more distinct. Alternatively, a black outline of the ACECs would make them more distinct from military lands
• Reference which maps go with each section. Use the name of the map as it is shown on the eplanning website. For example:
  o 3.1. Locatable Minerals Mapping
  o CYRMP_AltsPrelim_locatable_mineral_A
  o 3.2 Land and Realty Mapping
  o CYRMP_AltsPrelim_Recreation_FairbanksSU_B
• Provide a combined ACEC, Minerals and Realty map for all alternatives
• Identify airports and M&O camps on all maps, including airport boundaries, when necessary (see also Lands and Realty general comment).

When are the alternatives chosen? Discussion about the process.
Cooperating Agencies
With deference given to villages for original knowledge relevant to the BLM planning process, more Tribal governments need to be considered cooperating agencies in the NEPA process that is guiding the BLM land planning process.
TCC may choose to request cooperating agency status based on the delegated legal jurisdiction from the BIA and authorization from member Tribes.
Consultation Requirements
Doyon is also concerned that as major owners to the subsurface and would request the BLM consultation requirement fulfilled.
Request for BLM to send Tanana the ACEC report to review. Discussion about Tozitna River ACEC. No representation from Tozitna and this should be reviewed by the whole tribe and corporation and have a meeting with the tribe and corporation to review this.
Request that BLM does interviews with elders for traditional lands both in Allakaket and Alatna.
Is there any funding for consulting with the tribes to offset the costs?
Given the present political climate, I would not finalize this plan or its recommendations under the current administration with its anti-earth friendly attitudes and rhetoric.

Table B-6
Process-Related

The Ruby Tribe requests a Government to Government (G2G) consultation relationship with BLM for discussing BLM's planning process and Impacts and needs of the tribe.
Doyon, accordingly, fully expects to be engaged by BLM in meaningful consultation throughout each stage of the process, and intends to provide further comments and input through consultation and the public comment process.
Consultation with federally recognized tribes, however, is more than public involvement and outreach. Because this is the last time the Bureau will accept formal comment before the Draft Resource Management Plan is issued, and because communities of the region obtain a very high percentage of consumed food from the near-community habitat, it is important that the agency excels in not only communication but government to government consultation and supporting cooperating agency requests from planning area tribal communities.
Tribal communities in the planning area may possess the best knowledge of the land and resources and consequently more Tribal governments need to be considered cooperating agencies in the NEPA process guiding the BLM plan.
Many representatives of multiple villages in the CYRMP area have expressed interest to have BLM conduct additional Government to Government (GtoG) meetings in the current phase of developing alternatives.
We urge the BLM to consult with rural residents to assess impacts to loss of access to traditional use areas wherever the PLO is proposed to be removed.
Other Regulations, Laws, Policies, etc.
It is critical that the RMP fully recognize and reflect ANILCA's access provisions, and that BLM implement the final plan in a manner that carries out the letter and spirit of these requirements.
It should be without dispute that any elements of the RMP that may affect access to inholdings within CSUs and general (non-CSU) BLM-managed public lands must be fully consistent with these provisions.
The PAC applies a ROW exclusion area to "suitable river segments classified as Wild per the Wild and Scenic Rivers Act" (page 9, alternative B), which is inconsistent with the ANILCA Title XI transportation and utility system process that allows for ROWs across CSUs, including Wild and Scenic Rivers.
We also reiterate the State's strong objection to a wild and scenic river study and remain opposed to any recommendations for additional wild and scenic river designations on BLM lands as the study is in direct conflict with Section 1326(b) of ANILCA. We also object to considering rivers as suitable, even if just for analysis purposes (i.e., BLM Manual 6400) and applying interim management that would be inconsistent with ANILCA for a designated river.
Establishing buffers for CSUs inappropriately alters the carefully considered balance established by Congress for Alaska, as described in ANILCA (Section 101(d)).
The proposed travel management restrictions for individual ACEC units restrict methods of access allowed under ANILCA Sections 811 and 1110(a).
Any proposed closures and restrictions would also be subject to additional public outreach and regulatory requirements associated with the ANILCA closure process (see ANILCA access section in the EIRMP).

Table B-7
Planning Issues

Why does BLM want to combine two plans into one big plan?
Another question, there are old RMPs that this new RMP is replacing: the Utility Corridor and the Central Yukon, are these different areas than what will now be in the RMP? Are they outside of the boundaries that we currently have? Difficult to find a map that depicts this. Recommend that BLM show this on a map.
Thank you very much for arranging the meeting between your Assistant Secretary for Land and Minerals Management, Janice Schneider, and our staff during her recent trip to Alaska. We appreciated the opportunity to discuss a variety of topics, including PLOs, that are important to the State of Alaska and the Department of Interior and we were impressed by Assistant Secretary Schneider's focus and receptiveness to our comments and concerns. The purpose of this letter is to outline one of the issues that Governor Walker, Lieutenant Governor Mallott, and I discussed with you and Secretary Jewell on October 7, 2015 regarding the opportunity to lift priority PLOs in Alaska in order for the State to advance efforts for receiving its remaining land entitlements. At that meeting I very much appreciated your willingness to receive a priority list of these PLOs, which I committed to provide to you and is included in this letter. These PLOs are impeding our best efforts to prioritize and receive our remaining land entitlements. This letter will provide the background of these PLOs that were put into place as a result of the 1971 Alaska Native Claims Settlement Act (ANCSA); how those PLOs impede the State's ability to prioritize our remaining land entitlements under the 1959 Alaska Statehood Act; and respectfully request that The Honorable Sally Jewell, U.S. Secretary of the Interior lift or revoke those withdrawals in 2016.
The State of Alaska appreciates the opportunity to offer comments and suggestions relative to the Public Land Orders (PLOs) that withdrew millions of acres of Federal land in Alaska for study and classification purposes. The State is pleased to see BLM taking steps to evaluate the need for continued withdrawals particularly if the purpose for which they were established has been fulfilled.
We agree with BLM's initiative of large landscape planning that sets each RMP within the context of a larger landscape. We also appreciate BLMs efforts to make RMP updates cognizant of anticipated changes in landscapes, climate shifts, and land use demands. Similarly, the U.S. Fish and Wildlife Service (FWS) is using "climate smart" planning techniques in our Refuge Comprehensive Plan revisions, which are also set within the overall landscape and involve multiple cooperating partners.
While the draft maps of recommended mineral withdrawals for Alternatives B and C are fairly clear, in many areas there is intersection and overlap with four other important features: lands with wilderness characteristics, high-value watersheds, connectivity areas, and 100-year floodplains (p4, bottom, p5, bottom). For these features, it is difficult for the reader to visualize which lands are involved and related to which box in the alternatives matrix. A carefully color coded map of these latter four features would be helpful when considering the location and effects of potential mineral withdrawals. Also, there has been some early indication that in the Dalton Highway Corridor almost no lands would be considered for withdrawal from mineral entry, and no lands would be managed for wilderness characteristics in Alternative C. This is a preliminary decision that we do not totally agree with (see below), but nevertheless, these are features and decisions that should be clearly mapped.

Table B-7
Planning Issues

Somewhere in the "Land and Realty" concept, or below in Concept 3.3 "Lands with Wilderness Characteristics," the BLM should discuss and plan for habitat connectivity. Maintaining habitat connectivity is one of the most important actions managers can take to provide for resilience in the face of climate change, a finding based on an extensive analysis of research and biodiversity planning recommendations made during the past two decades (Heller and Zavaleta 2009). By working together, the BLM, FWS, and the Northwest Boreal Landscape Conservation Cooperative (NWB LCC) have determined that there are BLM lands that deserve special attention because they connect existing CSUs (Magness and Robertson 2016). A relatively small connection spanning BLM lands in between CSUs could be one of the most important and cost effective ways we can allow for climate adaptability as habitat changes may force species' movements across the landscape. It also fills BLM's planning mandate to plan and manage at landscape scales. Thinking proactively about connectivity while our landscape is still largely intact not only could save billions in future costs, but with minimal land designation or special management can maintain the iconic Alaskan landscape for centuries.
is there any mechanism to protect confidentiality?

Table B-8
Consistency with State, Local, and Tribal Plans or Policies

Trying to control firewood contrary to ANILCA and Subsistence rights, trying to force upon us an extreme hardship.
The Stevens Village Traditional land use plan needs full review & consideration, concerning the corridor lands adjacent to the Doyon Corp. lands.
Looking at the southern portion of the Dalton Corridor, near the Yukon River. Stevens Village council created a traditional use plan and this incorporates a large portion of the corridor. This plan has ethnic geographic place names of important locations both historical and currently used. Under FLMPA, tribal traditional plans are supposed to be considered for compatible uses. There is a lot of cultural resource areas and not all are inventoried, sacred sites and burial sites. Elders want these protected and inventoried but remain confidential.
Federal government needs to sit down and negotiate with Venetie as land owners (non ANCSA corporation).
Under FLPMA, BLM is under constraints to convey lands under national interest. Why would BLM push to give away billions of dollars of subsurface resource in the Dalton corridor and the visually appealing lands, most visually appealing in the Dalton Corridor.
BLM solicitors are not looking at the statute for what was available for selection under statehood act. Concerned that the BLM solicitors are not doing thorough review on what was in statehood act and what constraints congress put into ANILCA.
ANILCA refers back to the statehood act and retains PLO 5150. Jack Reakoff will submit the information to BLM for review.
How does the Scenic Byway plan fit into this?
Discussion about state statute (Dalton Hwy statute 200) that discusses the restriction of state disposing of land within 5 miles of the highway right of way, state can't dispose of land except for public utilities and doing leases in the nodes only for non-residential purposes.
This goal, and the objectives that follow, suggest that all lands with wilderness characteristics should be so managed, irrespective of the agency's multiple use mandate. Unfortunately, this is misleading, and it is not consistent with BLM's land use management obligations or policies.
This goal, and the objectives that follow, suggest that all lands with wilderness characteristics should be so managed, irrespective of the agency's multiple use mandate. Unfortunately, this is misleading, and it is not consistent with BLM's land use management obligations or policies.
…consistent with the Manual, BLM must meaningfully "engage cooperating agencies, the public, and other interested parties" [including ANCs] in the land use planning process as it relates to the management of lands with wilderness characteristics."
BLM must carry out its obligations under ANCSA and Titles XIII and XI of ANILCA in developing and implementing the RMP to ensure that subsistence uses and access to subsistence resources are protected.
BLM must ensure the RMP is fully consistent with its obligations under ANCSA and ANILCA, including with respect to subsistence uses and access to subsistence resources, and that it ensures that Doyon will, throughout the duration of the plan, enjoy reasonable access over lands in the planning area to make economic use of its inholdings.

Table B-8
Consistency with State, Local, and Tribal Plans or Policies

Opening PLO 5150 and conveying more lands to the State of Alaska would be in violation of the "Federal Land Policy and Management Act" of 1976.
AOC believes the balance struck by the U.S. Congress for Alaska between conserving federal public lands and allowing regulated use by the public of other federal lands applies to federal land management agencies like the BLM as well Congress.
In Section 201(4)(b) of ANILCA, Congress specifically recognized the potential need for surface access from the Haul Road (Dalton Highway) to the Ambler Mining District and allowed the corridor to cross "the boot" of Gates of the Arctic National Park. BLM plans such as this should be consistent with this Congressional intent, as such a route would likely need to cross some BLM land in the planning area.
ROW exclusion areas could directly conflict with the ANILCA Section 1323(b) access provision.
Furthermore, FLPMA Title V does not envision a preemptive prohibition of ROWs on large areas of BLM lands. The definition of ROW exclusion areas specifically contradicts BLM's stated goal (page 7) "to meet public needs for use authorizations such as rights of way."
Because they exceed 100,000 acres, proposed ROW exclusion areas should be subject to Congressional Review under FLPMA Section 202(e)(2), as they are "a management decision that excludes (that is, totally eliminates) one or more of the principal or major uses for two or more years with respect to a tract of land of one hundred thousand acres or more" (43 U.S.C. 1712).
We appreciate and strongly support the inclusion of language concerning how ANILCA-specified uses, particularly relating to subsistence, would be compatible with lands with wilderness character.
The configuration of the BLM land divisions are in conflict with the existing decision-making structure among the Tribal communities. In broad manner, the discordant land units pose administrative challenges to the conventional business practices within the organization structure of TCC.
To alleviate the unfamiliar land structure, there is a need to revisit the BLM planning area boundaries and adjust them to become more sympathetic to Native political structure in rural areas. For example, the reconfigured areas originally in the Central Yukon planning area that were transferred to the Bering Sea Western Interior planning area may need to be restored for the interests of obtaining improved Tribal consultation input. Specifically, the Nulato Hills area transferred from the Central Yukon to Bering Sea Western Interior planning areas. The village of Nulato is a member of the Yukon-Kokukuk subregion of TCC and aligned in political relations with Galena, Kaltag, Huslia, Koyukuk and Ruby, all of which are in the Central Yukon planning area.
It is recommended that the central Yukon Resource planning area be subdivided into management units similar to subunit divisions carved out for special management concern in the Eastern Interior Resource Management Planning area. At minimum, the CYRMP area may be easier to manage the planning process if there were three or more subunits including: 1) Dalton Highway Transportation corridor, 2) Yukon-Upper Koyukuk (equivalent to villages in the TCC Yukon-Tanana subregion) and 3) Yukon-lower Koyukuk (equivalent to the villages in the TCC Yukon-Koyukuk subregion). Further consultation with affected Tribes would lend better information on how to subdivide areas within the CYRMP that make sense to the Tribal leadership. Adopting subunits within the CYRMP area that are in agreement with existing management structures among those rural communities would facilitate more input and, likely, improve public, community and Tribal participation.

Table B-8
Consistency with State, Local, and Tribal Plans or Policies

Ensure that alternatives and proposed actions of the RMP do not conflict with the Alaska National Interest Lands Conservation Act's (ANILCA) legal mandates of seven refuges in the planning area including Kanuti, Koyukuk, Nowitna, Innoko, Arctic, Yukon Flats and Selawik.
This plan should place a renewed emphasis on multiple-use management of public lands.
As directed by the Mining and Minerals Policy Act of 1970 the BLM through this plan should encourage the development of the mineral resources of the planning area.
BLM should emphasize their multiple-use mandate in developing their final alternatives.
The State requests that the respective roles of ADF&G and BLM be recognized in the plan along with a commitment to cooperate on issues of mutual interest. We ask that all alternatives meet the intent of the MOU, particularly in regards to ADF&G's role as the "primary agency responsible for management of all uses of fish and wildlife on State and Bureau lands," the "primary agency responsible for the management of use and conservation of fish and wildlife resources on Bureau lands," and "the primary agency responsible for policy development and management direction relating to uses of fish and wildlife resources on State and Bureau lands." We request the alternatives avoid decisions on allocation of fish and wildlife, which are the purview of the Boards of Fisheries and Game.
Many of the proposed restrictions in the PAC, such as restrictions on stream crossings or rights-of-way, potentially overlap with existing ADF&G permitting authority for resident and anadromous streams.
The plan needs to recognize that existing environmental laws and regulatory authorities are in place to protect resource values, both on BLM-managed land in the planning area and on adjacent lands, including CSUs.
Where state management authorities or resources are involved, we also request advance consultation with the appropriate state agency.
Applying ROW exclusion or avoidance area designations could unnecessarily preclude future access needs or interfere with the statutorily required ANILCA Title XI process.
If BLM chooses no mineral withdrawals and/or does not implement stringent permitting with adequate compliance monitoring, Kanuti NWR would find it impossible to fully meet its establishment purposes under the Alaska Native Interest Lands Conservation Act (ANILCA). These purposes include: (1) maintaining fish, wildlife, and habitats in their natural diversity; (2) fit/flit international treaty obligations; (3) provide subsistence opportunity; and (4) maintain water quality and quantity. We respectfully ask that BLM honor Kanuti Refuge's legal establishment purposes and continue to cooperate with FWS so that the management of BLM watersheds that feed the refuge will allow us to meet our purposes long into the future.

Table B-9
Data, Science, Information

Eliza Jones has a traditional place names/dictionary document (Koyukon Athabascan Dictionary (J. Jette and E. Jones, 2000, Alaska Native Language Center, Univ. of AK, Fairbanks) that BLM should review. Eliza interviewed elders for traditional place names. BLM should also follow up with Eliza to look at these.
BLM needs to review the Carol Scott subsistence study for traditional use areas from 1991-1992 (published in 1993) and the state subsistence studies in consideration for the resources.
Subsistence uses and harvest areas are well documented by Carol P Scott in 1992/93 published in 1998 as: "Invitation to Dialogue: Land and Renewable Resource Use Over Time In Wiseman, Alaska" Technical Report NPS/CCSOUW/NRTR-98-D3 NPS D-31. Ms. Scotts study was partially funded by BLM. Note Wiseman Subsistence use areas Map 6 page 181 occurring on BLM lands.
The Alaska Department of Fish and Game Subsistence Division did another Subsistence uses and mapping study of Wiseman/ Coldfoot in 2011. Published as Technical Paper NO. 372, "Subsistence Harvest and Uses of Wild Resources by Communities in Eastern Interior Alaska, 2011" David Holen, Sarah M. Hazell Koster. Note mapping of intensive subsistence use areas on BLM lands pages 342- 383)
The Mesa and Putu sites are two major complexes known to have been occupied as far back as 11,000 BC, and the latter is within a day's walk from the Dalton Highway. Our members are aware of sites that have not been officially recognized by BLM and could easily be located within a future RMA or mining site.
What follows are a series of climate change adaptation principles outlined within a seminal review article from Conservation Biology. These concepts should guide BLM as it develops this resource management plan for central Alaska: • Increase the extent of protected areas, • Improve representation and replication of ecosystem type within protected-area networks, • Improve the management of existing protected areas to facilitate resilience, • Design new natural areas, including across elevational gradients, to maximize resilience, • Protect movement corridors, stepping stones, and refugia, • Plan and manage for ecosystem function, • Increase landscape permeability to species movement, • Elevate and enhance monitoring programs for wildlife and ecosystems, • Incorporate predicted climate-change impacts, such as precipitation changes, into species and land-management plans, programs, and activities, and • Develop a dynamic landscape conservation plan (See: Mawdsley, J. R., O'Malley, R., and Ojima, D. S. (2009). A review of climate-change adaptation strategies for wildlife management and biodiversity conservation. Conservation Biology, 23(5), 1080-1089.)
TMC requests that BLM use the 2015 USGS assessment of selected minerals for the CYPA and update their maps to reflect more current information in order fulfill their requirement to address Mineral Potential in their alternatives.
2015 assessment of selected mineral group within the CYPA: https://pubs.usgs.gov/of/2015/1021/downloads/ofr2015-1021 report.pdf.

Table B-9
Data, Science, Information

The whole state of Alaska done by the same method as the CYPA https://pubs.er.usgs.gov/publication/ofr20161191.
Fact sheet describing the method used by USGS. https://pubs.usgs.gov/fs/2017/3012/fs20173012.pdf.
Current minerals information should be used and incorporated into the maps before development of final alternatives.
ADF&G Division of Subsistence technical reports providing contemporary subsistence use information (Holen, D., et al. 2012, Brown, C.L., et al. 2016, Wilson, S.J. and M.L. Kostick. 20 16) are provided as an enclosure. Enclosure: ADF&G Division of Subsistence technical reports providing contemporary subsistence use information Brown, C.L., et al. 2016. Harvests and uses of wild resources in 4 Interior Alaska communities and 3 Arctic Alaska communities. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 426, Fairbanks. This report includes information on Anaktuvuk Pass. Holen, D., et al. 2012. Subsistence harvests and uses of wild resources by communities in the eastern Interior of Alaska, 2011. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 372, Anchorage, Alaska. This report includes information on Anaktuvuk Pass, Allakaket, Alatna, Wiseman, Bettles, and Evansville. Wilson, S.J. and M.L. Kostick. 2016. Harvest and use of wild resources in Hughes, Alaska, 2014. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 424, Fairbanks. This report includes information on the community of Hughes.
Published research demonstrates the adverse effects of roads on caribou movement (Wilson et al. 20 16) and caribou habitat (Wilson et al. 2014, Chen et al. 20 17). This is important in relation to the proposed Ambler Road corridor and any other road corridors (e.g., Umiat) that would be developed to access areas with mineral potential. Effects here accrue to not only wildlife, but also subsistence users who rely on wildlife.
We strongly recommend prohibition of non-subsistence OHV (4-wheeler or snowmachine) use off the Dalton corridor and spur routes for a variety of reasons. Subsistence users in the upper Kobuk (outside the affected area) do not support catch and release fishing. We suspect this opinion is more widespread and affects subsistence users in more remote drainage's in the Yukon River Basin (e.g., upper Koyukuk). Here is the URL for the document: https://pdfs.semanticscholar.org/695f/8b2295e414f6f7077b5703247de81 f131 a46.pdf.
Soil composition, permafrost characteristics, and ice content data should ideally be used to help determine where OHV traffic and ROW's are allowed. New permafrost maps by Jorgenson and ice-content maps could be used to help identify where sensitive soils exist throughout the region. High ice-content regions should be identified and protected as ACEC's.

Table B-9
Data, Science, Information

Somewhere in the "Land and Realty" concept, or below in Concept 3.3 "Lands with Wilderness Characteristics," the BLM should discuss and plan for habitat connectivity. Maintaining habitat connectivity is one of the most important actions managers can take to provide for resilience in the face of climate change, a finding based on an extensive analysis of research and biodiversity planning recommendations made during the past two decades (Heller and Zavaleta 2009). By working together, the BLM, FWS, and the Northwest Boreal Landscape Conservation Cooperative (NWB LCC) have determined that there are BLM lands that deserve special attention because they connect existing CSUs (Magness and Robertson 2016). A relatively small connection spanning BLM lands in between CSUs could be one of the most important and cost effective ways we can allow for climate adaptability as habitat changes may force species' movements across the landscape. It also fills BLM's planning mandate to plan and manage at landscape scales. Thinking proactively about connectivity while our landscape is still largely intact not only could save billions in future costs, but with minimal land designation or special management can maintain the iconic Alaskan landscape for centuries.
The U.S. Fish and Wildlife Service, through the NWB LCC, contributed additional scientific analyses of the planning area by cooperating with the Boreal Ecosystems Analysis for Conservation Networks (BEACONS) project. This project sets up a landscape-scale adaptive management framework that allows BLM and other landowners managing for multiple uses to determine the impacts of various management actions. In a rapidly changing climate, we cannot look to historic baseline to serve as control to compare management impacts against. The systems are changing too rapidly for baseline to be relevant. This is also important because we often lack baseline data due to the size and remoteness in this region. The BEACONs team has identified a benchmark network to help inform this BLM plan. We ask that the BLM prioritize at least three levels of benchmarks: (a) existing CSUs which would be considered as adequate or minimal benchmarks; (b) connectivity or buffer areas around CSUs that incorporate BLM lands that would be additive to CSUs and desirable as minimal benchmarks; and (c) BLM lands that would serve as benchmarks in their own right. These aspects should be mapped and incorporated into planning alternatives (e.g., Alternative B would contain the most extensive benchmark network, including benchmarks within BLM lands and adjacent CSUs, Alternative C including at least partner CSU benchmarks, and alternative D, the least). By prioritizing other CSUs as benchmarks, BLM can leverage the capacity and funding from its partner agencies in order to carry out its management responsibilities. By prioritizing benchmarks entirely within the BLM lands ensures that BLM can do adaptive management regardless of partner participation. We believe that even Alternative D should recommend at least some benchmarks in lands previously identified as important for habitat connectivity. This is especially important for monitoring effects of intensive mineral and transportation permitting that may occur in Alternative D.
Using BEACONS, the landscape can be viewed as a matrix of varying land use intensities. By planning ahead, BLM can more efficiently avoid resource conflicts, environmental impacts, and costly delays to development projects. Land facet connectivity and BEACONS are two tools that BLM should use to most effectively allocate lands for the various multiple use purposes.

Table B-9
Data, Science, Information

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Table B-9
Data, Science, Information

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Table B-10
Out of Scope

Implementation
The DOI/BLM built Marion creek campground and housing with no local input.
The DOI/BLM administratively closed Wisemans traditional wood lot on Marion Creek with no local notice or local input.
Putting up gates and signs on local access roads sometimes on state lands and roads like Slake creek, Clara creek, Hammond river, and Nolan creek roads the locals use for hunting.
Implement many restrictive mining regulations without doing economic impact studies required in the Regulatory Flexibility Act.
Implementing 3809 regs not following the RFA, stopping issuance of permits and requiring 3802 wilderness area reclamation standards have destroyed the KMD.
Implementing mine bonding and 3rd part estimates forcing the state to stop issuing recreational dredging permits in the inner corridor.
Administratively close down Marion creek Wiseman Villages traditional wood lot the DOI/BLM recognized in their 1st encounters with locals.
Need for more garbage collection at waysides. Visual impacts and safety concerns with lack of adequate facilities.
Working with BLM is difficult to get retribution and/or compensation for actions caused on lands.
Will all development projects be required to have truly adequate remediation bonding in the event of a breach of containment? What kind of closure plans will be required of each/all projects? What kind of environmental testing will be required and who will enforce those requirements?
South Fork Koyukuk receives considerable airboat and jetboat traffic with fly-in access from the headwaters, and it cannot support increased recreation or hunting activities. This river also has active mining with gross violations of land use (driving large heavy equipment in the river where salmon and whitefish spawn).
Placer mining operations should be carefully considered and budgets should include adequate funds for monitoring resource extraction operations.
We are concerned that they will not be adhered to for the life of the plan as implementation will be left to the discretion of future managers who may not be familiar with either the overarching intent or specific provisions in ANILCA. Further, BLM has yet to develop regional guidance, which would help ensure ANILCA is recognized and implemented appropriately on BLM-managed lands statewide, where applicable.
Non-BLM Authorizations
The DOI/BLM Halting/interfering with State of Alaska Coldfoot node land staking and sales.
Allowing the Park ranger Pete Christian to hunt subsistence with a rifle even though he had a big furnished house in Fairbanks.
Concern that with state management, there is no requirement for tribal consultation for permitting project level activities.
The planning process and conclusions can have no legal effect on state selections.

Table B-10
Out of Scope

Desire for BLM to limit the motor size, hovercraft, etc. up the Koyukuk River/Kateel River. Discussion that these and the Yukon are navigable rivers and this is a state of Alaska issue.
It may be time for a draw which will effectively curtail my guiding clients to the point of no profit but I would much rather see the moose survive and flourish than see them over hunted just to take some monetary gain.
The State does not recognize Tribal Governments in the form of G to G consultation and cooperating agency status.
Is the BLM going to have a say in what is down the road, concerns about the new administration and what the priorities will be under the new President?
Discussion about how much the new Secretary of Interior will understand Alaska specific issues and ANILCA. Direct question about how much the new acting director understands Alaska.
The 1980 ANILCA Sec.906 (a)(2) EXTENSION OF SELECTION PERIOD. In furtherance and confirmation of the State of Alaska's entitlement to certain public lands in Alaska, §6(b) of the Alaska Statehood Act is amended by substituting "thirty-five years" for "twenty-five years." The State's request for additional lands, especially reserved and appropriated lands after 1993, is not proper or valid.
New roads: Western AK access road.- some Issues we have: A) Would like to discuss with BLM the likelihood of the road being built B) What economic benefits may the construction, maintenance and existence of a new road bring to the Ruby community? C] What are the potential impacts that a new road may have to subsistence harvest?
We are deeply concerned about and opposed to the proposed Ambler road for this reason.
The State is "over selected" by 18 million Acers on vacant, unappropriated, or unreserved lands at this time. The PLO 5150 lands were withdrawn, and continue to have "reserved interest" to the United States. The current PLO 5150 lands do not legally qualify to be "Top Filed" as they do not qualify under the Statehood Act Selections found in Alaska Statehood Act sec. 6 (a) and (b), "vacant, unappropriated, or unreserved lands."
ANILCA sec. 906(j) mandates retention of the PLO 5150 lands by the Federal Government.
The analysis should include anticipated costs and staffing needed to ensure adequate compliance, monitoring, and reclamation.
Policy Decisions
Opposing CFR 43 9239.2-5 Free Passage over and trough public lands - now not recognized by DOI/BLM charging extreme amounts of money.
The DOI/BLM conveyed inaccessible lands to the State on South Fork Koyukuk, Slate, Clara & Marion creeks with no local input.
The DOI/BLM created ACECs withdrawing more land against ANILCA with no local notice or input.
The KMD was organized in 1886, our bylaws state we are the local government Article 3, section 3. This doesn't conflict with State or U.S. Govt laws, yet the DOI/BLM refuses to recognize us, denying our rights.

Table B-10
Out of Scope

The U.S. Government is treating the Western States like Territories, depriving us from Article IV. Section 4.
The DOI/BLM doesn't recognize the KMD, the local government empowered under an Act of Congress, the 1872 mining law, within Congresses Power respecting Territories Article IV. Section 3, second paragraph.
Instead of protecting the states against domestic violence, the U.S. Government is resorting to domestic violence in the unconstitutional withheld lands in the West. This has happened repeatedly to Native Americans, Women, Ranchers, Loggers, Miners, and Farmers etc. This violates our 10th Amendment.
Fighting the RS 2477 Historic Coldfoot to Chandala lake overland winter trail.
Turn mine permitting over to the State and Mining District.
Concern about funding cuts for firefighting under new President of the United States.
Before transferring any acreage from public trust, that baseline approach would establish a more responsible Lands Transfer Program policy addressing true critical areas of concern regarding the impacts of any development of this region.
We are concerned that they will not be adhered to for the life of the plan as implementation will be left to the discretion of future managers who may not be familiar with either the overarching intent or specific provisions in ANILCA. Further, BLM has yet to develop regional guidance, which would help ensure ANILCA is recognized and implemented appropriately on BLM-managed lands statewide, where applicable.

Appendix C
List of Commenters

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APPENDIX C
LIST OF COMMENTERS

In total, the BLM received 62 submissions during the preliminary alternatives concepts comment period. Below is a listing of all known commenter names and their organization if applicable and known. Some commenters were anonymous or unknown, and some commenters submitted multiple submissions.

- Barry Whitehill
- Ben Birch
- Bert Bamford
- Bob Sattler, Tanana Chiefs Conference
- Chad Hutchison, on behalf of Senators Bishop and Coghill
- David R. Krause, The Wilderness Society
- Deantha Crockett, Alaska Miners Association
- Desiree Sorenson-Groves, National Wildlife Refuge Association
- Don Ross
- Edward Sarten, Ruby Tribal Council
- Elisabeth Dabney, Northern Alaska Environmental Center
- Frank Kiem
- Greg Dudgeon, NPS, Yukon-Charley Rivers National Preserve, Gates of the Arctic National Park and Preserve
- Gregory Siekaniec, USFWS
- Heidi Schoppenhorst
- Jack Reakoff
- Jack Hession, Alaska Chapter of the Sierra Club

- Jay Armstrong
- Jerry Birch, Taiga Mining Company, Inc.
- Jim Mery, Doyon, Limited
- Joe Kurtak
- John Stam
- Julie K. Wahl
- Karen Gordon
- Lark Lewis
- Larry Bartlett, Alaska Backcountry Hunters & Anglers
- Linda Evans, Baan O Yeel Kon Corp
- Marleanna Hall, Resource Development Council for Alaska, Inc.
- Mary Patina
- Mary Zalar
- Miki and Julie Collins, Alaskan Freelance Writers/Photographers
- Ray Kukowski
- Rod Arno, Alaska Outdoor Council
- Roger Kaye
- Ron Yarnell
- Susan Magee, representing the State of Alaska, Department of Natural Resources
- Suzanne Little, The Pew Charitable Trusts
- Tom Meacham
- Travis Booms