

Scoping Report for the
Central Yukon
Resource Management Plan

Prepared by the
Bureau of Land Management
Central Yukon Field Office
Fairbanks, Alaska

March 2015



Alaska



Scoping Report

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Executive Summary

Introduction

The Bureau of Land Management (BLM) Central Yukon Field Office, Fairbanks, Alaska, is preparing a resource management plan (RMP) with an associated environmental impact statement (EIS) for the Central Yukon Planning Area. The BLM's RMPs form the basis for every action and approved use on the 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 (1991), Central Yukon RMP (1986), and Southwest Management Framework Plan (1981). The revised Central Yukon RMP will replace both the Utility Corridor and Central Yukon RMPs in their entirety and a small part of the Southwest Management Framework Plan. Additionally, the RMP will cover BLM-managed lands in the Fairbanks North Star Borough and south of the Richardson Highway, areas that are currently not included in any management plan.

Scoping is an early and open process to determine the scope of issues surrounding the proposed actions and to identify significant issues. This stage of the planning process influences the scope or range of issues that the RMP will seek to address. 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.

This scoping report summarizes the issues and management concerns raised by the public, other agencies, and tribal governments during the scoping period.

Public Scoping Activities

The BLM published a notice of intent in the *Federal Register* on June 14, 2013, to announce the agency's plan to prepare an EIS and to invite suggestions on the issues to be addressed in this EIS. The notice of intent noted that the public comment period would conclude on December 11, 2013, but it was later revised to extend until January 17, 2014.

The BLM launched the Central Yukon RMP website (<http://www.blm.gov/ak/cyrmpp>) in early 2013. This website provides background information about the Central Yukon Planning Area, applicable documents and reports, a project timeline, information about the planning process, meeting information, news releases, contact information, and other resources. The BLM continues to use the project website as its primary tool for reaching the public who have online access.

The BLM held 16 public meetings in 15 different communities during the scoping period. Meetings generally consisted of a short open house followed by a presentation by the Field Manager and then public testimony. A total of 291 people signed in at the meetings.

In January 2015, after this scoping report was drafted, the BLM adjusted the boundaries of the Anchorage and Central Yukon field offices. The adjustment creates a contiguous management block of land in Western Alaska and will provide for improved landscape management of key habitats. As a result of the field office boundary adjustment, the BSWI and Central Yukon planning boundaries will be adjusted. The eastern portion of Nulato Hills, lands that were formerly in the Central Yukon planning area, will become part of the Bering Sea-Western Interior (BSWI) planning area. These lands are shown in Figure 1.2 as the Nulato Subunit.

The BLM is currently developing a notice of planning boundary changes for publication in the *Federal Register*. The revised Central Yukon Planning Area will encompass approximately 13.1 million acres of BLM-managed lands. Given the timing of the boundary change, this scoping report was not modified to remove comments related to the Nulato Hills.

Issue Summary

The public, organizations, and other agencies submitted comments orally at meetings or in writing by letter, email, or fax. Outside of the scoping meetings, written comments were provided by approximately 70 individuals, agencies, or organizations. An additional 2,900 form letters were submitted via email as of January 28, 2013. Additional comments and nominations for ACECs were received between July and early September 2014.

After analysis of scoping comments, the BLM identified the 13 preliminary planning issues. An issue is defined as a matter of controversy or dispute over resource management activities or land use and entails alternatives between which to decide. Usually, the causal relationship between the activity or use and undesirable results are well defined or can be documented, and the level of controversy is high enough to merit further analysis. Statement of planning issues orients the planning process so that interdisciplinary thought, analysis, and documentation is directed toward resolving the planning issues during preparation of the RMP.

1. Management of Access and Comprehensive Travel Management
2. Climate Change
3. Fish and Aquatic Species Habitat Management
4. Invasive and Non-native Species
5. Alaska Native Claims Settlement Act Withdrawals
6. Utility Corridor Withdrawal
7. Management of Mining
8. Management of Sand and Gravel
9. Management of Recreation and Visitor Services
10. Subsistence
11. Management of Wildlife Habitat Management
12. Water Quality, Wetlands, and Riparian Habitat Management
13. Wilderness Characteristics

Future Steps in the Planning Process

Future steps in the planning process are listed below.

1. Analysis of the Management Situation: This document describes the existing condition of the planning area and summarizes the current management decisions from the existing RMPs. This information will be used to help develop sections of the Draft RMP/EIS.
2. Alternative Development: The alternatives will address planning issues identified during scoping, will meet the purpose and need of the project, and address goals and objectives to be developed by the BLM's interdisciplinary RMP team.
3. Draft RMP/EIS: The next official public comment period will begin when the Draft RMP/EIS is published. The draft document will be widely distributed to tribes, Native corporations, elected officials, regulatory agencies, and members of the public; and it will be available on the project website (<http://www.blm.gov/ak/cyrmp>). The availability of the draft document

will be announced via a Notice of Availability in the *Federal Register*, and a public comment period will follow.

4. Proposed RMP/Final EIS: This document will revise the Draft RMP/EIS to incorporate changes based on public comment. It will include a response to public comments. A *Federal Register* notice will announce the availability of the Proposed RMP/Final EIS.
5. Protest Period and Governors' consistency review: Upon publication, the Proposed RMP/Final EIS will be available for a 30-day public protest period and 60-day Governor's consistency review.
6. Approved RMP and Record of Decision: The BLM will resolve all protests and any inconsistencies, and the Approved RMP and Record of Decision will be published.

Acronym List

AAC:	Alaska Administrative Code
ACEC:	Area of Critical Environmental Concern
ADFG:	Alaska Department of Fish and Game
ANCSA:	Alaska Native Claims Settlement Act
ANILCA:	Alaska National Interest Lands Conservation Act
AS:	Alaska Statute
ATV:	All terrain vehicle
BLM:	Bureau of Land Management
CEQ:	Council on Environmental Quality
CFR:	Code of Federal Regulations
CSU:	Conservation System Unit (designated by ANILCA)
DOI:	U.S. Department of the Interior
EIS:	Environmental Impact Statement
EPA:	U.S. Environmental Protection Agency
ESA:	Endangered Species Act
FLPMA:	Federal Land Policy and Management Act
NEPA:	National Environmental Policy Act
NPS:	National Park Service
NWR:	National Wildlife Refuge
OHV:	Off-highway Vehicle
ORV:	Off-road Vehicle [old terminology used in Appendix A]
ORV:	Outstandingly remarkable value [pertaining to wild and scenic rivers]
PLO:	Public Land Order
RAC:	Alaska Resource Advisory Council (BLM Alaska)
RMP:	Resource Management Plan
RNA:	Research Natural Area
ROD:	Record of Decision

ROW:	Right-of-way
TAPs:	Trans-Alaska Pipeline
USC:	U.S. Code
USFWS:	U.S. Fish and Wildlife Service
USGS:	U.S. Geological Survey
VRM:	Visual Resource Management
WACH:	Western Arctic Caribou Herd
WSR:	Wild and Scenic River

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Chapter 1. Introduction



Sukakpak Mountain with the Dalton Highway in the foreground.

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1.1. Overview

The Bureau of Land Management (BLM) Central Yukon Field Office, Fairbanks, Alaska, is preparing a resource management plan (RMP) with an associated environmental impact statement (EIS) for the Central Yukon Planning Area. 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 (1991), Central Yukon RMP (1986), and Southwest Management Framework Plan (1981). The revised Central Yukon RMP will replace both the Utility Corridor and Central Yukon RMPs in their entirety and a small part of the Southwest Management Framework Plan. Additionally, the RMP will cover BLM-managed lands in the Fairbanks North Star Borough and south of the Richardson Highway, areas that are currently not included in any management plan.

This scoping report summarizes the issues and management concerns raised by the public, other agencies, and tribal governments during the scoping period. Comments were submitted both in writing and orally at scoping meetings. These concerns will be integrated into the planning process to help focus the planning process on issues of concern.

1.2. Purpose and Need for the Central Yukon RMP

The purpose of the Central Yukon RMP 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; proposed withdrawals; and, suitability for congressional designations, such as an addition to the National Wild and Scenic River System. All decisions conform with the multiple use and sustained yield mandate of the Federal Land Policy and Management Act.

The need for the Central Yukon RMP 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 routes for the proposed Alaska Stand Alone Gas Pipeline and the proposed Trans-Canada Gas Pipeline, and 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 Central Yukon RMP 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. This RMP will reflect new information, resource data, and local community knowledge needed to better manage these public lands.

1.3. Planning Area Description

The Central Yukon Planning Area is located in central and northern Alaska and encompasses approximately 13.1 million surface acres administered by the BLM. The planning area encompasses the Dalton Highway Corridor, BLM-managed lands in the central Yukon River watershed, lands south and west of Fairbanks, and the Central Arctic Management Area Wilderness Study Area.

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.

Total acreage of BLM-managed lands includes encumbered lands, which are selected by, but not yet conveyed to, the State of Alaska and Alaska Native corporations. These encumbered lands are referred to as "State-selected" and "Native-selected" lands. Final adjudication of State-selected land claims are through the Alaska Statehood Act, whereas Native-selected land claims are through the Alaska Native Claims Settlement Act (ANCSA). These land conveyances are ongoing, and therefore, BLM-managed land status acreage frequently changes.

This land use planning effort does not include National Wildlife Refuge lands created by the Alaska National Interest Lands Conservation Act (ANILCA) and managed by the U.S. Fish and Wildlife Service (USFWS), nor public lands managed by the National Park Service (NPS), or the subsurface 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. In order to include all BLM-managed lands in the RMP, the planning area boundary is drawn on a large scale. Decisions in the Central Yukon RMP, however, *will only apply to BLM-managed lands*.

Table 1.1. Land Status within the Revised Central Yukon Planning Area

Land Category	Total Acres ^a	Percentage
Unencumbered BLM-managed lands	8,105,000	15
State-selected BLM-managed lands	4,300,000	8
Native-selected BLM-managed lands	712,000	1
Total BLM-managed Lands	13,117,000	24
Total Acres under other ownership	42,628,000	76
Total All Lands	55,745,000	

^a Rounded to nearest 1,000 acres and based on generalized land status, which categorizes lands to the nearest square mile.

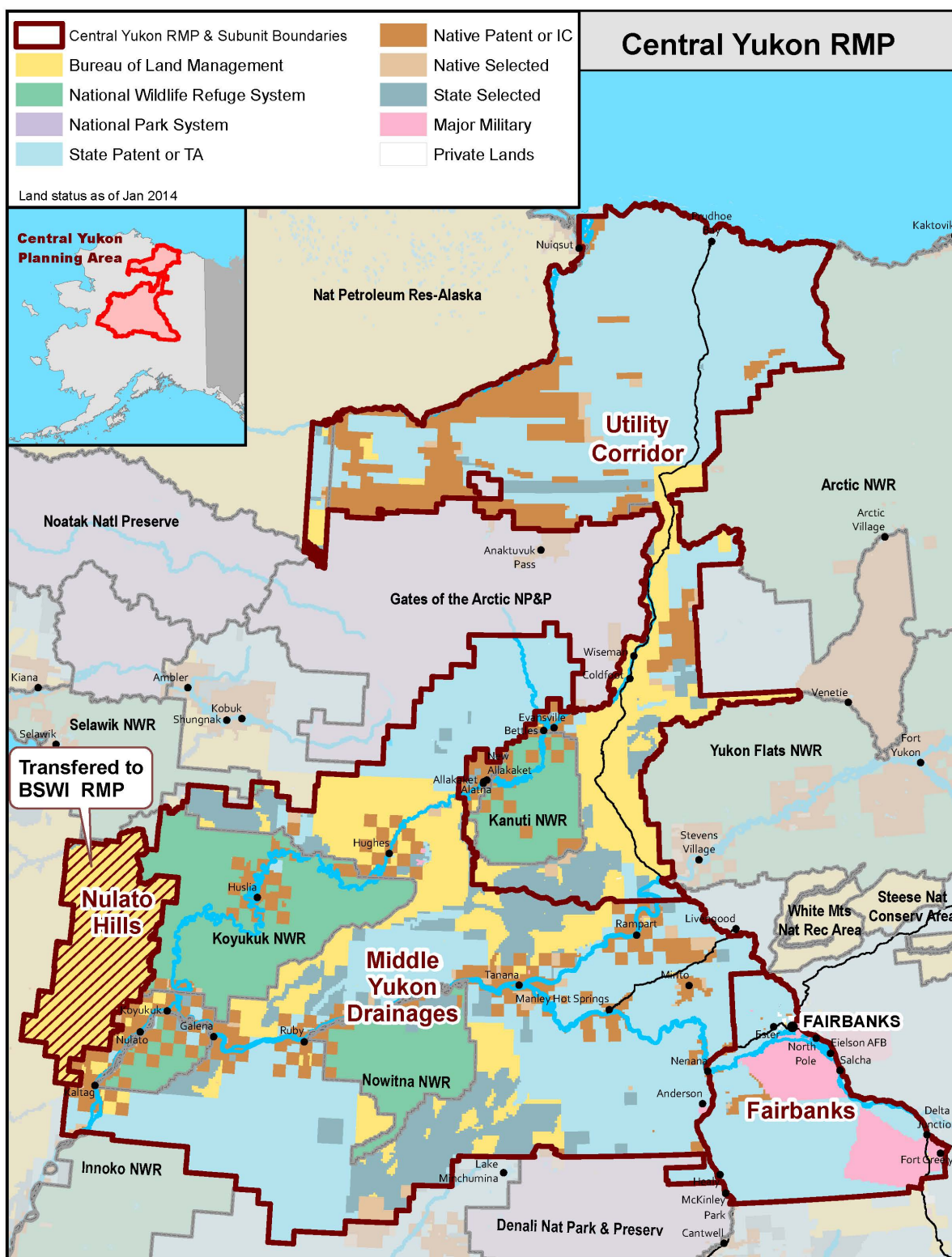


Figure 1.1. Original Central Yukon Planning Area Boundary and Subunits

Figure 1.1 shows the Central Yukon Planning Area and four planning subunits: Utility Corridor, Middle Yukon Drainages, Fairbanks, and Nulato Hills. These subunits were established based on internal BLM concerns and input from the public during scoping. Reasons for splitting the planning area into smaller subunits include: the vast size of the planning area, scale of planning maps, diversity of issues between the roaded areas and non-roaded areas, ease of public review, and pending changes in field office boundaries. The Nulato Subunit was transferred to the Anchorage Field Office during preparation of this report and will be covered by the BSWI RMP.

Utility Corridor Subunit

The Utility Corridor Subunit includes lands along the Dalton Highway from just south of the Yukon River to the North Slope, the Kanuti National Wildlife Refuge (NWR), and scattered parcels on the North Slope. The Central Arctic Management Area Wilderness Study Area is included in this subunit. There are issues specific to the Utility Corridor Subunit related to the Trans-Alaska Pipeline, Dalton Highway, and utility corridor designation. This area also receives a high level of visitor use relative to the remainder of the planning area. Most of the scoping comments related to planning subunits supported including the Kanuti NWR in the Utility Corridor Subunit. The refuge is relatively close to the Dalton Highway and thus is likely to experience road-related impacts. The community of Bettles-Evansville is connected to the Dalton Highway by a winter ice road. Gates of the Arctic National Park and Preserve, the Arctic NWR, and Yukon Flats NWR are located adjacent to the subunit. Managers of these units are also concerned about road-related impacts.

Comments from some individuals in Alatna and Allakaket were opposed to the Kanuti River being in the Utility Corridor Subunit. These commenters were concerned that the voice of their small communities would be outweighed by comments from industry and other larger governments with interests in the Utility Corridor.

Fairbanks Subunit

This subunit consists of BLM-managed lands to the west and south of Fairbanks. It includes those parts of the Fairbanks North Star and Denali boroughs that overlap with the planning area, and large tracts of military lands. The BLM-managed lands in the Fairbanks Subunit consist of smaller, scattered parcels that are difficult to manage and may be suitable for sale or exchange. The lands are relatively accessible and near the most populated part of the planning area. The boroughs and the military are major stakeholders in this subunit.

Middle Yukon Drainages Subunit

Most BLM-managed lands in the Middle Yukon Drainages Subunit are remote and not accessible by road. BLM-managed lands are mostly in large, contiguous blocks. Communities within the subunit are small and have primarily subsistence-based economies. The Elliott Highway enters the eastern side of the subunit, but primarily accesses State land. Other roads are associated with specific communities and do not connect to the Alaska Highway System. Denali National Park and Preserve and the Selawik NWR are adjacent to the southern edge of the subunit. Additionally, there are three refuges within the subunit: Nowitna, Koyukuk, and Innoko Northern Unit, Innoko NWR.

Nulato Hills Subunit

This subunit consists of a 2.9 million-acre block of BLM-managed lands on the east flank of the Nulato Hills. These lands are remote and not roaded. There are no communities within the subunit, although Kaltag, Nulato, and Koyukuk are nearby and residents of these communities likely use the subunit for subsistence purposes. This subunit was transferred to the BLM Anchorage District in January 2015 and will become part of the BSWI RMP. All future planning steps will be completed as part of the BSWI planning effort. Nulato Hills was identified as a subunit in this scoping report to facilitate transfer of this area to the BSWI RMP. Public comments

related to the Nulato Hills subunit are included in this scoping report as they were not addressed in the BSWI scoping report (BLM 2014).

1.4. Scoping Process

Scoping is an early and open process to determine the scope of issues surrounding the proposed actions and to identify significant issues. This stage of the planning process influences the scope or range of issues that the RMP will seek to address. 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.

1.4.1. Description of Process

Public involvement is an important component of the RMP/EIS development process. Public involvement engages the public in the decision-making process and allows for full environmental disclosure. The Council on Environmental Quality (CEQ) provides guidance for public involvement in 40 CFR Section 1506.6, ensuring that federal agencies make a diligent effort to involve the public in the National Environmental Policy Act (NEPA) process.

Section 202 of the Federal Land Policy and Management Act (FLPMA) directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on public lands. BLM's Land Use Planning Handbook, H-1601-1 (BLM 2005) has guidance for conducting public involvement during land use planning. Public involvement requirements for both NEPA and FLPMA will be satisfied through this RMP/EIS process.

Public involvement for the Central Yukon RMP includes:

1. **Public scoping** before NEPA analysis begins to determine the scope of issues and alternatives to address in the RMP.
2. **Public outreach** via letters of invitation to participate, news releases, postcards, newspaper advertisements, and informational flyers.
3. **Collaboration** with federal, State, local, and tribal governments; Alaska Natives and Native Corporations; the BLM Alaska Resource Advisory Council; and cooperating agencies.
4. **Consultation** with Alaska tribes and ANCSA regional and village corporations.
5. **Public review** and comments on the draft RMP/EIS, which will analyze environmental effects and identify a range of alternatives, including the BLM's preferred alternative.

This scoping report documents the results of the first two phases of the public involvement process and provides information about the ongoing collaboration process. When the BLM collects information during scoping, it may also use it to develop the alternatives addressed in the EIS associated with the RMP. The two components of the BLM's scoping process are "internal scoping" and "external scoping".

Internal scoping is when an agency or cooperating agencies solicit comments and issues internally within the agency to determine preliminary and anticipated issues and concerns. The Central Yukon RMP internal scoping began with the creation of a "preparation plan" in April 2013. The preparation plan highlighted anticipated planning issues, management concerns, and preliminary planning criteria. An interdisciplinary team of BLM Central Yukon Field Office

resource specialists identified anticipated planning issues and the methods, procedures, or data to use in compiling the draft RMP/EIS. The preparation plan was reviewed and approved by the BLM's Washington Office.

External scoping is a public process to reach beyond the BLM and identify concerns of importance to the public. External scoping helps ensure that problems are identified early and properly studied; that issues of no concern do not consume time and effort; and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1) requires the preparation of a scoping report to capture public input in one document. This report must summarize the comments received during the formal external scoping period. It also must describe the issues and management concerns from public scoping meetings, internal scoping meetings, and the pre-plan analysis. The report must also include a discussion of how to incorporate these comments into the RMP.

1.4.2. Outreach

The following sections summarize outreach efforts for the Central Yukon RMP during the scoping period.

1.4.2.1. Notice of Intent

The BLM published a notice of intent in the *Federal Register* on June 14, 2013 to announce the agency's plan to prepare an EIS, to describe the locations and tentative schedule for scoping meetings, and to invite suggestions on the issues to be addressed in this EIS. The notice of intent noted that the public comment period would conclude on December 11, 2013, but it was revised to extend until January 17, 2014, due to the temporary government shut-down that occurred between October 1 and October 16, 2013.

The BLM completed the formal scoping process when the scoping period closed on January 17, 2014. Comments received or postmarked by the end of the scoping period are summarized and presented in this document. To the extent practicable, the comments received past this date will be considered during the development of the EIS, but may not be summarized in this report.

1.4.2.2. Central Yukon RMP Website

The BLM launched the Central Yukon RMP website (<http://www.blm.gov/ak/cyrmp>) in early 2013. This website provides background information about the Central Yukon Planning Area, applicable documents and reports, a project timeline, information about the planning process, meeting information, news releases, articles, contact information, and other resources. The BLM announces dates and locations for all scoping meetings on this website.

The BLM continues to use the project website as its primary tool for reaching the public who have online access. For those without computer access, the BLM uses a combination of printed products and local media to keep participants informed of the planning process.

1.4.2.3. Mailings and Email notification

The BLM uses mailings to help inform the public of the planning process and upcoming meetings. A project mailing list is maintained and updated as additional names are added. The following mailings informed the public during the scoping period.

- June 2013: Postcard providing notification of the beginning of the planning process and reference to the project website.
- November 2013: Newsletter providing information about the Central Yukon Planning Area, the planning process, and upcoming public meetings.
- November 2013 to January 2014: postcards to all post office box holders in the scoping communities (excluding Anchorage and Fairbanks) to alert residents of upcoming public meetings and how to comment. Communities where scoping meetings were held are listed in [Table 1.2, “Public Scoping Meeting Dates, Locations, and Attendance”](#).
- November 2013: Postcard to project mailing list for both the Central Yukon RMP and the BSWI RMP to provide additional notice of the public meeting in Anchorage. This meeting was a joint meeting for both RMPs.

Additionally, an email was sent out to interested parties providing notification of upcoming meetings a week or two before the meeting and again on the day of the meeting.

The Central Yukon Field Office solicited nominations for Areas of Critical Environmental Concern (ACECs) from May 1 to August 29, 2014. A letter inviting ACEC nominations was sent to the project mailing list on May 1, 2014. A reminder email was sent to all parties on the email list 30 days before the end of the nomination period.

1.4.2.4. Media Releases and Public Service Announcements

Several techniques were used to notify the public of the proposed RMP project and scheduled public meetings. Advertisements were placed in the *Fairbanks Daily News-Miner* for both Fairbanks meetings; all meetings were also advertised online on community calendars and the “What’s Up” listserv. An announcement for the second Fairbanks meeting was posted on the KUAC events calendar, which is broadcast on TV.

An announcement for the Anchorage meeting was broadcast on KSKA public radio and listed in the *Anchorage Daily News* online calendar. Public service announcements were issued and public radio announcements were broadcast on several local radio stations including Kiyu and KIAM.

The BLM also distributed public notice through press releases, email, the project website, flyers to local governments, postcards, and the newsletter. The BLM posted notice of Fairbanks meetings on Facebook. Non-governmental organizations were also active in notifying constituents of the RMP through email, Facebook, and other outlets.

A press release was issued on May 1, 2014, to notify the public of the ACEC nomination period.

1.5. Collaborative Planning

1.5.1. Public Meetings

The BLM scoping meetings were scheduled to occur across the entire planning area. The meeting dates and locations are detailed in [Table 1.2, “Public Scoping Meeting Dates, Locations, and Attendance”](#).

The meeting format and information presented were similar for all public meetings. The rural community meetings generally included a brief introductory period where BLM staff would meet residents and talk about the maps posted on the walls. The presentation by the Field Manager would last 20 to 30 minutes with questions and comments recorded during and after the presentation. The Anchorage and Fairbanks meetings had a more formal 2- to 3-hour “open house” where residents could arrive at their convenience, talk to BLM staff about the handouts and posters, and decide whether to stay for the evening presentation. A few questions were taken during the presentation, but in general, most questions and comments occurred at the end.

Comment forms and a recording device were available at the meetings so that attendees could submit written or oral comments during the meeting or mail them in at a later date. Some of the materials shared during the scoping meetings are available on the project website.

The scoping meetings were well attended with a total attendance of 291 people in 15 meetings. Participation in the scoping process was widespread, with many hours of questions and testimony, along with many written submissions. Meeting participants spoke with great passion about the values of the land, the rivers, the fish and wildlife, and the subsistence traditions.

Two meetings were scheduled in Stevens Village. Both meetings were cancelled at the request of the village. In one case, all members of the community were either out of town or at winter camp.

Table 1.2. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Location	Meeting Date	Estimated Attendance
Fairbanks (first meeting)	10/28/2013	51
Wiseman	10/31/2013	12
Nenana	11/04/2014	25
Nulato	11/5/2013	9
Venetie	11/07/2013	8
Lake Minchumina	11/18/2013	11
Ruby	11/19/2013	5
Anaktuvuk Pass	11/20/2013	12
Anchorage	12/04/2013	54
Fairbanks (second meeting)	12/09/2013	40
Koyukuk	12/10/2013	7
Tanana	12/11/2013	19
Bettles/Evansville	12/12/2013	7
Galena	12/13/2013	7
Hughes	12/16/2013	9
Allakaket	1/06/2014	15

1.5.2. Agency Coordination

At the outset of the planning process, the BLM sent letters of invitation to potential cooperating agencies listed below:

- U.S. Department of the Interior, Fish and Wildlife Service
- U.S. Department of the Interior, National Park Service
- Alaska Department of Natural Resources, representing the State of Alaska
- Denali Borough
- Fairbanks North Star Borough
- North Slope Borough
- Northwest Arctic Borough
- Eielson Air Force Base
- Joint Base Elmendorf-Richardson
- U.S. Army Garrison Fort Wainwright

The U.S. Fish and Wildlife Service (USFWS), State of Alaska, and National Park Service indicated an interest in being cooperating agencies. The BLM has developed memorandums of understanding (MOUs) with the USFWS and State of Alaska. The MOUs lay out the roles and responsibilities of each agency. In addition, tribal governments were invited to be cooperating agencies at the same time that the BLM initiated government-to-government consultation as described in the following section.

In their scoping comments the State of Alaska identified the following key issues of interest. The RMP should:

- Meet provisions of ANILCA
- Adopt the management intent established in Department of Natural Resources' State Area Plans for State-selected lands
- Recognize State authorities relative to fish and wildlife
- Maintain access to State land
- Identify State- and Native-selected lands in the planning area
- Provide reasonable consistency and compatibility across land jurisdictions to minimize user conflict and confusion
- Identify split-estate lands where the BLM manages the subsurface
- Be consistent with the State's need to facilitate resource development and allow for multiple use of State land

1.5.3. Consultation with Tribes and Alaska Native Corporations

The BLM sent a letter of notification and inquiry to the federally recognized tribes listed below, consistent with policies concerning government-to-government consultation. The BLM offered tribes the opportunity to participate in formal government-to-government consultation, to participate as a cooperating agency, or to simply receive information about the project. Letters inviting consultation were sent in May and June 2013. Letters were sent to the tribes a second time via fax in November 2013 as a reminder that the scoping period was more than half over.

The Venetie Tribal Council responded with a request for consultation. The BLM responded by letter and also discussed it by phone with the Tribal Administrator on February 10, 2014. The phone call was followed up with more information on consultation by email the next day. The Native Village of Nuiqsut requested consultation in November 2013. The BLM consulted

with Nuiqsut via phone in December 2013. The BLM met with the Allakaket Tribal Council on January 6, 2014. Consultation with potentially affected tribal governments will continue throughout the planning process.

In accordance with the U.S. Department of the Interior Policy of August 10, 2012 on Consultation with Alaska Native Claims Settlement Act, the BLM mailed letters to the village and regional corporations listed in the table below in July 2012. These letters invited the corporations to consult and provided background information about the plan. No response to these letters was received. The BLM will continue to include the corporations in all outreach efforts during the planning process and will consult on a more formal basis if requested.

Table 1.3. Federally Recognized Tribes and ANCSA Native Corporations Contacted during Scoping

Federally Recognized Tribes	ANCSA Native Corporations (associated tribes)
Alatna Village	K'oyitl'ots'ina, Limited (Alatna, Allakaket, Hughes, and Huslia)
Allakaket Village	
Hughes Village	
Huslia Village	
Village of Anaktuvuk Pass	Nunamiut Corporation, Incorporated (Anaktuvuk Pass)
Evansville Village	Evansville, Incorporated (Evansville Village)
Galena Village (AKA Loudon Village)	Gana-A'yoo, Limited (Galena, Kaltag, Koyukuk, and Nulato)
Village of Kaltag	
Village of Koyukuk	
Nulato Village	
Nenana Native Association	Toghotthele Corporation (Nenana)
Native Village of Nuiqsut	Kuukpik Corporation (Nuiqsut)
Native Village of Minto	Seth-De-Va-Ah Corporation (Minto)
Native Village of Ruby	Dineega Corporation (Ruby)
Native Village of Stevens	Dinyee Corporation (Stevens Village)
Native Village of Tanana	Tozitna, Limited (Tanana)
Native Village of Unalakleet	Unalakleet Native Corporation (Unalakleet)
Manley Hot Springs Village	Bean Ridge Corporation (Manley Hot Springs)
Rampart Village	Baan O Yeel Kon Corporation (Rampart)
Native Village of Venetie Tribal Government	None
	Regional Native Corporations
	NANA Regional Corporation
	Arctic Slope Regional Corporation
	Doyon, Limited Regional Corporation

1.5.4. BLM Alaska Resource Advisory Council

The Secretary of the Interior established resource advisory councils (RACs) to provide advice or recommendations to BLM management. RACs are generally composed of 15 members of the public representing different areas of expertise. The Secretary appoints Council members based on their ability to provide informed, objective advice on a broad array of public lands issues and their commitment to collaboration in seeking solutions to those issues.

The BLM Alaska RAC membership includes a cross-section of Alaskans from around the state representing: energy, tourism, and commercial recreation interests; environmental, archaeological, or historic interests; and, elected officials, Alaska Native organizations, and the public-at-large.

Members of the RAC are on the Central Yukon RMP mailing list and received notice of scoping meetings. The BLM also presented about the RMP at the RAC's October 2013 meeting in Anchorage and April 2014 meeting in Fairbanks. The BLM will continue to seek input from this group during future meetings throughout the planning process.

1.5.5. Other Outreach Efforts

During the scoping period, the BLM provided updates or gave presentations on the RMP at regularly scheduled meetings of various organizations and at other public venues. These presentations provided more information on the planning process, planning area, and planning schedule. Participants were informed how to provide comments and had an opportunity to ask questions.

Table 1.4. Additional Outreach Efforts for the Central Yukon RMP

Date(s)	Organization
November 20, 2013	Eastern Interior Federal Subsistence Regional Advisory Council
November 7, 2013	Western Interior Federal Subsistence Regional Advisory Council
February 26, 2014	Western Interior Federal Subsistence Regional Advisory Council
August 21, 2013	North Slope Federal Subsistence Regional Advisory Council
August 22, 2013	Northwest Arctic Federal Subsistence Regional Advisory Council
June 7, 2013	Citizens Advisory Council on Federal Areas
June 2013	Alaska Miners Association
October 2013	Alaska Miners Association Convention
October 12–13, 2013	Fairbanks 2013 Go Winter! Expo
April 2014	Fairbanks 2014 Spring Outdoor Show
November 2013	National Park Subsistence Resource Commission, Gates of the Arctic National Park

Chapter 2. Issue Summary



Spooky Valley in the Ray Mountains, Alaska

2.1. Comment Summary

Public comments shape the planning process by identifying project-related questions and issues of concern. Typically questions are in reference to: the project, existing environment, extent of temporal and spatial impacts, or potential consequences to the human environment from the proposed action. Substantive questions and issues of concern are grouped by subject matter in this scoping report. This information is used in the alternatives development process, the study of the affected environment, and in the analysis of environmental consequences (or impacts).

2.1.1. Method of Comment Collection and Analysis

The public, organizations, and other agencies submitted comments orally at meetings or in writing by letter, email, or fax. Each letter, email, fax, or oral statement was considered a comment submission. Individual comments were then parsed out of each comment submission and assigned to an issue category. Comments were then sorted by key words, and similar comments were summarized as statements of concern, which are listed in Appendix A.

Table 2.1. Central Yukon RMP Scoping Comment Categories

Comment Category	Comment Code
Process Comments	
Meeting procedures, enhancing public participation at meetings	MTGS
National Environmental Protection Act (NEPA) process, purpose and need	NEPA
Planning area and planning process	PLAN
Government-to-government consultation	G2G
Special Designation Comments	
Special management areas: Areas of Critical environmental concern and research natural areas	SPEC ACEC RNA
Special management areas: wilderness characteristics, wilderness, wilderness study areas	SPEC WC CAMA WILD
Special management areas: wild and scenic rivers	SPEC WSR
Special management areas: general comments, national natural landmarks, national trails, byways	SPEC OTHER
Biological and Physical Environment Comments	
Climate change	CLI
Air quality and air resources	AIR
Cultural and paleontological resources	CUL
Fire management and ecology	FIRE
Soil resources, permafrost	SOIL
Visual resources and visual resource management	VRM
Water quality and water resources	WAT
Riparian and wetlands	WET
Fish and fish habitat	FISH
Vegetation	VEGE
Special status species, threatened and endangered species	SSS
Invasive species	INV
Wildlife, wildlife habitat, migration corridors, connectivity	WILD
Land Use Related Comments	
Access, R.S. 2477, Ambler, Bettles, and Umiat roads	ACC
Land ownership and land use, rights-of-way, corridors, easements	LAND
Land conveyance in the Utility Corridor	PLO 5150
Utility Corridor specific	UTL

Comment Category	Comment Code
Minerals management, locatable minerals, gold mining	MIN
Oil and gas	O&G
Coal	COAL
Geothermal	GEOTH
Sand and gravel	GRAV
Forest and forest products	FOR
Recreation management	REC
Travel management, off-highway vehicle use	TM
Mitigation	MIT
Social and Economic Related Comments	
Public safety, hazardous materials, health, and environmental justice	SAFE
Traditional ecological knowledge	TEK
Subsistence and traditional way of life	SUB
Economics	ECON
Other Comments	
New data and available information	DATA
Acknowledged	ACK

2.1.2. Summary of Public Comments Received

Oral comments were made at 15 public meetings. In many of the smaller communities most of the attendees at the meetings were tribal members, and tribal government representatives were often present. These meetings were very informal and individuals did not always identify an affiliation.

Outside of the scoping meetings, written comments were provided by approximately 70 individuals, agencies, or organizations. An additional 2,900 form letters were submitted via email as of January 28, 2013. Additional comments and nominations for ACECs were received between July and early September 2014.

Table 2.2 shows the number of comment letters received from each type of affiliation. Letters on business, agency, or organization letterhead were considered to represent that organization. All other letters were considered to represent individuals.

Table 2.2. Number of Submissions per Affiliation

Affiliation	Number of Written Submissions	Commenters in this category
Individual	approximately 2,969	Multiple
Organizations	15	Pew Trust (2), Alaska Wilderness League (2), Earthworks, Western Arctic Caribou Working Group, Center for Water Advocacy, Alaska Miners Association, Yukon River Drainage Fisheries Association, Capital Trails Vehicle Association, National Ecological Observatory Network, the Wilderness Society, Alaska Quiet Rights Coalition, Northern Alaska Environmental Center, Resource Development Council, Biological Discovery in Woods Hole Ecosystems Center, Alaska Trappers Association
Business	1	Taiga Mining Inc.
Federal Agency	2	U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service
State Agency	1	State of Alaska
Advisory Committees for State or federal agencies	1	Gates of the Arctic Subsistence Resource Commission

Affiliation	Number of Written Submissions	Commenters in this category
Tribal Government	5	Village of Hughes, Venetie Village Council (2), Alatna, Allakaket
ANCSA Regional Corporation	1	Doyon Limited
Cities	1	Allakaket City Council
Universities	5	Univ. of Alaska Fairbanks, Univ. of Texas Arlington, Univ. of California Santa Barbara, Lehigh Univ., and Univ. of Vermont
15 Community Meetings	N/A	Individuals, organizations, tribal representatives, city representatives

2.2. Issues Identified during Scoping

Analysis of public comments resulted in the identification of 13 planning issues to be considered during development of alternatives. An issue is defined as a matter of controversy or dispute over resource management activities or land use that is well defined and/or topically discrete, and entails alternatives between which to decide. Usually, the causal relationship between the activity or use and undesirable results are well defined or can be documented, and the level of controversy is high enough to merit further analysis. Statement of planning issues orients the planning process so that interdisciplinary thought, analysis, and documentation is directed toward resolving the planning issues during preparation of the RMP.

2.2.1. Issue 1: Access and Comprehensive Travel Management

This issue includes comments on motorized and mechanized vehicle use, management of trails, the State's roads to resources program, reservation of easements, potential impacts to National parks and wildlife refuges, Revised Statute (R.S.) 2477 rights-of-way, access provisions of ANILCA, and range of alternatives for off-highway vehicle designations. This is one of the largest comment categories with more than 160 comments.

Many comments were in general opposition to approval of the Ambler and Umiat road projects, proposed under the State of Alaska's Roads to Resources Program. Comments noted that there would be many environmental, social, and economic impacts from these projects and these must be included in the RMP/EIS cumulative impact analysis. One comment noted that the BLM should address the issue of the use of the Bettles Winter Road by the general public.

Several comments related to public land through private land and recommended that the BLM acquire easements or rights-of-way across private lands to provide access to public land.

Several comments requested the RMP acknowledge the existence of and include maps of access routes claimed by the State under R.S. 2477 and ensure that existing access routes are kept open for public use. The BLM should coordinate with the State to get their input on R.S. 2477 routes. The State of Alaska recommended specific language to be used in the RMP to describe R.S. 2477 routes.

The ANILCA ensures access and several comments were related to these sections of the Act. Comments noted that the RMP must specifically address and be in compliance with: ANILCA Title XI Transportation and Utility Systems; section 1110(a) which allows for snowmachines, motorboats, airplanes, and non-motorized surface transportation for traditional activities and travel to and from villages and homesites; section 1323(b) which guarantees access to inholdings;

and section 811 which provides for subsistence access on all federal public lands in Alaska, including access by off-highway vehicles where traditionally employed. The State of Alaska provided detailed comments on how to incorporate ANILCA provisions into the RMP.

There were many comments on the use of motorized and mechanized vehicles and management of trails. The majority of these comments came from one non-governmental organization. These were focused on maintaining or increasing opportunities for motorized access in the planning area. At least one alternative in the Draft RMP/EIS should maximize motorized recreation opportunities. Also noted was the need for analysis of the cumulative impacts to motorized recreation users from many past and present closures of motorized trails on public lands. Comments also made specific recommendations on trail inventory, trail management, single-track trails, conversion of motorized trails to non-motorized trails, closure of trails in wilderness areas, decommissioning of roads, and unfair treatment of motorized recreationists. Many of these were not particularly applicable to the Central Yukon Planning Area for the following reasons: 1) the planning area currently includes very few trails or roads of any kind (either motorized or non-motorized), 2) the BLM is unaware of any demand for single-track trails, and 3) there are no designated wilderness areas. Many of the comments were specific to Forest Service programs or step-down travel management planning.

Alternatively, comments from others recommended considering placing limits on motorized use (such as seasonal restrictions or weight limits) to protect sensitive areas such as wetlands, stream crossings, and important wildlife habitat, and minimize damage to soil and vegetation. The State requested that the BLM coordinate closely with its agencies to determine traditional routes of access, protect sensitive areas, and allow for off-trail game retrieval. A few comments recommended that the BLM consider closing some areas to all motorized use to protect sensitive resources and provide quiet recreation opportunities. Several recommended keeping the current five-mile non-motorized zone along the Dalton Highway.

Several comments addressed the Utility Corridor and the need to continue to manage the area as a utility corridor while protecting the viewshed, opportunities for tourism, and adjacent wildlife refuges and parks. As one comment noted, the issue of access is about more than just what happens on BLM-managed lands, but also the access it provides to adjacent lands and how they are managed. The Dalton Highway is a gateway to other State and federal lands.

Internally generated scoping questions related to access and travel management included:

- Is there a need for acquisition, termination, or re-location of 17(b) or other easements for access to public lands?
- What opportunities exist for cooperation and coordination with Native corporations in 17(b) easement management?
- What considerations are needed for management of existing and proposed rights-of-way including the Dalton Highway, Bettles Winter Road, and the State's Roads to Resources Program.
- Where and how should the BLM limit off-highway vehicle use?
- What are the effects of use off-highway vehicle use on natural resources and how can these impacts be reduced?
- Where are existing trails located and where are additional trails needed?
- Where have existing trails resulted in resource damage and what are the options for avoiding further degradation?

2.2.2. Issue 2: Climate Change

Climate change and its effects on the lands and resources are of great concern to many Alaskans. Many of the comments overlapped with other categories, reflecting the overarching nature of climate change. Many comments noted that climate change is not an issue and should not be given too much weight in the RMP/EIS. Other comments indicated that climate change is an issue and the RMP/EIS should fully address it. Comments recommended that the RMP incorporate adaptive management to address the changing environment and mitigate RMP contributions to climate change. Some comments noted that the RMP should prioritize existing subsistence use over new incompatible uses to minimize impacts from climate change. The RMP should fully analyze the impacts of climate change even though some of these impacts are uncertain. Comments recommended that the BLM incorporate the best available science in addressing climate change impacts.

Internally generated scoping questions related to climate change include:

- How should the RMP address the impacts of climate change?
- What land management strategies could be developed to reduce impacts and allow for adaptive management to respond to changes over time?

2.2.3. Issue 3: Fish and Aquatic Species

This category includes comments on fish and aquatic species. Comments related to potential impacts to fish habitats and the need to protect and reclaim these habitats. Comments noted the critical state of the Yukon River chinook run, the importance of fish for subsistence, and the need to meet obligations under the Yukon River Salmon Agreement. Some comments recommended additional survey or assessments to determine the extent of anadromy. Many comments related to the inclusion of measurable objectives for stream reclamation and rehabilitation. Some recommended closing high-value aquatic habitats to mining. Others identified specific watersheds that should be protected.

Internally generated scoping questions related to fish include:

- What fish species play a role in providing ecosystem services to humans and which should be identified as priority fish species? Where are the important habitats for these species located?
- What are the desired aquatic habitat conditions and the measurable performance standards to be used to determine if these conditions have been met or maintained?
- What specific actions or use restrictions should the BLM consider in order to maintain the ecosystem processes which form and maintain the desired habitat characteristics?
- How will riparian and aquatic resources be protected from adverse effects of mining and other surface disturbing activities?
- How will ecological processes and disturbance regimes that are fundamental in the development and maintenance of desired habitat conditions be conserved?
- How will the temporal and long-term loss of aquatic habitat function be mitigated in cases where aquatic habitat is adversely impacted by land use?

2.2.4. Issue 4: Invasive Species

Comments expressed concern regarding the spread of invasive species, particularly along the Dalton Highway and rivers. There is concern that invasive plant species may spread from the

Dalton Highway to nearby parks and refuges via the rivers. The RMP should include measures to reduce the introduction and spread of these species. The BLM should work with Alaska DOT to design road maintenance activities in a way that will not push seeds north along the highway. Some comments expressed concern about the possible use of chemical control measures. The Environmental Protection Agency noted that the RMP should also address aquatic invasive species to prevent deterioration of water quality in the planning area.

Internally generated scoping questions related to invasive species include:

- What is the extent of the spread of invasive non-native plants and what control methods should be employed?
- Which areas and species are the highest priority for management?

2.2.5. Issue 5: ANCSA Withdrawals

Comments related to Alaska Native Claims Settlement Act (ANCSA) withdrawals were generally coded to either the Lands or Minerals categories, but are discussed here because this is one of the major issues the RMP will address. Section 17 of ANCSA authorized the Secretary of the Interior to withdraw and reserve public lands for study and classification. This was done through a series of Public Land Orders (PLOs) issued between 1972 and 1975. The PLOs generally closed the lands to mineral leasing and some forms of mining. One opening order — PLO 6098 — was issued on December 17, 1981. This PLO modified PLOs 5173, 5180, and 5184 to open some lands to the mining laws and leasing laws. This PLO only affected lands on the southern edge of the planning area.

The BLM is required to review all existing withdrawals during the planning process and determine whether they should be retained, modified, or revoked. The ANCSA withdrawals were issued by the Secretary of the Interior and as such, can only be modified or revoked by the Secretary. Therefore, the Draft RMP/EIS will only make recommendations to the Secretary on the disposition of the withdrawals. Possible options are to recommend removing all withdrawals in the planning area; modifying withdrawals to open lands to some uses, but not all (for example, open to mineral leasing, but retain closure to mining laws); retaining withdrawals through replacement with new withdrawals under the authority of FLPMA; or simply retaining the current withdrawals.

In the Central Yukon Planning Area most of lands are covered by one of these PLOs. However, two of the PLOs (PLO 5180 and 5186) left the lands open to metalliferous mineral location, meaning that mining claims can be staked for gold, copper, silver, or other metals, but not for minerals such as limestone, gypsum, and phosphates. Because the metalliferous minerals are of the most interest, this means that these lands are essentially open to mining activity. PLO 6098 opened a small percentage of the area on the southern edge of the planning area to both mining and mineral leasing.

Many comments recommended retaining the existing closures to mining and to consider closing areas currently open to mining. Some comments identified specific areas that should be closed to mining such as the upper Chandalar River, headwaters of Dietrich and Atigun rivers, Areas of Critical Environmental Concern, research natural areas, wilderness study areas, eligible wild and scenic rivers, anadromous rivers, community drinking water aquifers, and lands upstream and adjacent to wildlife refuges.

Alternatively, other comments supported removal of these withdrawals and opening of the affected land to the mining and mineral leasing laws. Reasons cited are that the withdrawals are no longer

serving their original purpose and that current mining regulations, adopted since the PLOs were issued, require proper management of mining activities and thus withdrawals are not necessary.

Internally generated scoping questions related to ANCSA withdrawals include:

- Should the ANCSA 17(d)(1) withdrawals be retained, modified, or revoked?

2.2.6. Issue 6: Utility Corridor Withdrawal

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. Federal lands that were already reserved for a specific purpose were not available for selection. The Statehood Act gave the State 25 years (until 1983) to complete its selections. In 1971, PLO 5150 established a utility and transportation corridor along the general route of the Trans-Alaska Pipeline and made the lands in that corridor unavailable for selection by the State of Alaska.

In 1980, ANILCA granted the State an additional 10 years (until 1993) to complete its land selections. It also gave the State the right to file “future selection applications” on lands that were not available for selection at that time, in case they became available in the future. These future selection applications are called top filings. The State of Alaska top-filed on a large portion of the Utility Corridor lands that were reserved by PLO 5150, and did so prior to 1993. The State is interested in obtaining some of these top-filed lands. This would require a modification of PLO 5150, which is a very controversial issue.

Many of the comments were in opposition to modifying PLO 5150 and requested that lands within the corridor remain under federal management. Some of the reasons identified for maintaining federal management were: maintaining the area under the federal subsistence regulations, federal requirements for government-to-government consultation, higher potential for development under State management, and potential impacts to adjacent wildlife refuge lands. Residents of Wiseman, a subsistence based community within the corridor, noted that the only access to traditional subsistence use areas west of the Utility Corridor is across BLM-managed sections of the corridor. If these areas became State land, State regulations would preclude access to traditional hunting and trapping areas inside the Gates of the Arctic National Park and Preserve. Some comments also questioned the legality of transferring the land to the State.

Alternatively, many other comments supported modification of PLO 5150 and transfer of lands within the corridor to State management. Stated reasons for support of this position include: facilitation of a gas pipeline, federal restrictions on mining, transfer of federal mining claims to State claims, and increased potential for economic development. One comment noted that a large part of the corridor north of the Brooks Range was transferred to State management as a result of the 1991 Utility Corridor RMP. Since that time, State management has continued to protect the transportation corridor and its resources.

Internally generated scoping questions related to the PLO 5150 include:

- Should the BLM recommend modification of PLO 5150 to allow conveyance of lands within the utility corridor to the State?
- If PLO 5150 is modified, what areas and how many acres of State top-filed lands should be included?

2.2.7. Issue 7: Mining

This category includes comments on mining under the General Mining Act of 1872. Many comments related to mining covered multiple topics. Comments on oil and gas, coal, and geothermal resources are discussed in other sections of this document. This was one of the larger comment categories with 78 comments. The majority of the comments were related to development of performance standards, reclamation, monitoring, and potential impacts from mining.

Several comments noted potential negative impacts to water quality, fish habitat, and riparian vegetation from mining. Many comments recommended the BLM should put specific performance standards in place for mine operations. These standards need to be robust enough to account for future changes in weather and soil conditions due to climate change. Acid mine drainage was of concern.

Alternatively some comments supported mining and noted that the RMP should encourage development of the mineral resources in the planning area and that under current regulations, mining can be performed in an environmentally safe manner. The BLM-managed lands should be managed for multiple use and this includes mining. Additionally the RMP should contain a thorough discussion of the mineral potential of the area – not just the likelihood of development of already identified mines, prospects, and mineral occurrences. The BLM should review all data related to regional geology, geochemistry, and geophysics, and include maps, data summaries, and a thorough discussion of geologically-based mineral deposit models and their likelihood of occurrence within the planning area.

Internally generated scoping questions related to mining include:

- Which lands should be open to mining?
- Which lands should be closed to mining?
- What terms, conditions, or other special considerations are needed to protect other resource values while conducting activities under the operation of the mining laws?

2.2.8. Issue 8: Sand and Gravel

This section includes comments on mineral materials or sand and gravel pits. There is a high demand for sand and gravel for maintenance of the Trans-Alaska Pipeline and the Dalton Highway. This demand is expected to increase with the potential future construction of additional roads and a gas pipeline. Numerous material sites exist along the Dalton Highway, and proliferation of pits is of concern given the importance of the area for tourism. Additionally, each pit is a potential source of invasive plants. As one comment noted, a thorough assessment of existing and future gravel needs is needed to aid in the management of this program and assessment of cumulative effects.

Some comments identified particular areas where gravel pits are not appropriate and recommended limiting the areas where pits are allowed and also additional community outreach before approving new gravel sites. Other comments noted the great need for these materials to be available and economical to maintain existing and future expansion of infrastructure.

Internally generated scoping questions related to sand and gravel include:

- Where should future sand and gravel sites be allowed and how should they be managed?

- How should existing sand and gravel pits be managed?
- Once pits are reclaimed, how should these areas be used (e.g., minimally developed recreation sites)?

2.2.9. Issue 9: Recreation and Visitor Services

This was one of the larger comment categories with more than 100 comments. Several comments addressed recreation and visitor facilities. Comments noted that the RMP should provide for development of recreational facilities, parking, and bathrooms in roaded areas, with an emphasis on the Dalton Highway. There was also a call to provide opportunities for dispersed camping with the use of low-impact modes of transportation and all terrain vehicles where practical. Continued access by both motorized and non-motorized recreation should be provided while minimizing damage from such uses. The State's generally allowed uses on State land should also be considered for State-selected land and BLM-managed lands adjacent to State lands.

Alternatively some of the public was opposed to additional facility development along the Dalton Highway, as it would detract from the wild nature of the area and would attract more visitors. Some recommended a focus on the undeveloped recreation tourism market.

Some comments suggested that permits for hunting guides should be restricted or eliminated due to oversaturation of users, especially within and extending out from the Dalton Highway corridor, because additional permits would degrade the quality of experience and have a profoundly harmful effect on the wildlife resource. A few communities mentioned conflicts between local hunters and non-local hunters using personal airplanes or air taxis. Other comments suggested that the BLM evaluate a guide selection process similar to one that the State of Alaska is developing.

Internally generated scoping questions related to recreation and visitor services include:

- What areas are important for recreation?
- What types of recreational opportunities should the BLM provide?
- Are more recreational facilities needed and where should they be located?
- How can impacts from recreation be minimized?
- How can the BLM best manage commercial permits?

2.2.10. Issue 10: Subsistence

This was one of the larger comment categories with more than 80 comments. Many of the comments in this category related to concerns about potential impacts to traditional and customary uses or subsistence resources. It was noted that decisions in the RMP could impose significant limitations on access and activities that could adversely impact customary and traditional uses. The BLM must carry out its obligations under ANCSA and Titles XIII and XI of ANILCA to ensure that subsistence uses and access to subsistence resources are protected. The public noted that the RMP should consider alternatives that reduce or eliminate negative impacts to subsistence and some comments suggested subsistence be a priority land use.

Many comments discussed protection of subsistence resources. Some of these comments are also discussed under Fish and Wildlife categories. The importance of salmon and caribou to the region both as a food source and as an integral part of the culture was the topic of many comments. The RMP must protect all subsistence resources, not just fish, fur, and game habitats. Forests suitable for firewood and cabin logs should be set aside in areas where villages have customarily gone

for these resources, and berry patches that are traditionally used year after year, and all the other numerous natural resources rural residents depend so heavily upon.

Climate change impacts on subsistence resources and access was another major topic of comments. The public cautioned that the BLM needs to consider the impacts of climate change on subsistence resources and practices in the RMP. For example, changes in terrestrial conditions may influence availability of wildlife and fish species to harvest, as well as access to harvest areas. Changes in the seasonality of events such as river freeze-up and break-up may affect opportunities for customary and traditional uses of fish and wildlife. Rural cultures and lifestyles may be threatened due to changes in subsistence opportunities. Economic losses to local subsistence communities may occur as traditional target stocks change in their relative abundance. The RMP needs to provide for changing conditions over time and take a conservative approach to development due to the unknowns of climate change.

One other topic of concern was the potential transfer of federal lands to the State. There is no federal rural subsistence priority on State lands. This was of particular concern in the Dalton Highway corridor near Wiseman. This issue is discussed under section 2.2.6.

Internally generated scoping questions related to subsistence include:

- Which areas are important subsistence use areas?
- Which areas are important for the maintenance of subsistence resources such as caribou, fish, or moose?
- Are subsistence resources being damaged by land uses? If so, how can the BLM reduce impacts to subsistence from land use activities it permits?
- How can the BLM ensure continued access to subsistence resources?

2.2.11. Issue 11: Wildlife

This section includes comments on wildlife resources, potential impacts to wildlife, and possible mitigation measures to protect wildlife and their habitat. Related comments are also included under section 2.8 Special Designations and 2.2.10 Subsistence. A topic of many comments was the identification of wildlife corridors to provide for migration and connectivity between habitats in light of climate change and future infrastructure. Most, but not all comments, were in support of establishing corridors. The public offered several tools that the BLM could use to help identify potential corridors.

Other comments related to potential impacts to wildlife habitat and the need to mitigate significant impacts. In some cases, specific habitat areas were mentioned as being critical. Comments suggested that the RMP should consider placing restrictions on the use of goats and related species due to the potential for transmission of disease to Dall sheep. The State recommended that restrictions used to protect habitat require rigorous data to support the decision and that some restrictions are best considered at the permitting level rather than the land use planning level. The State also requests that the BLM recognize existing State authorities relative to fish and wildlife management.

Many comments also related to the regulation of off-road vehicles and trail density due to potential impacts to wildlife. Most comments cautioned against overestimating the impacts to wildlife and overregulating motorized uses. Seasonal limitations during periods critical to wildlife were suggested as an alternative to complete trail closures.

Internally generated scoping questions related to wildlife include:

- Which animals should be identified as priority species? Where are the important habitats for these species located?
- What are desired habitat conditions for priority wildlife species?
- What specific actions or use restrictions should the BLM consider to protect wildlife habitats and achieve desired population levels?
- What are the desired habitat conditions for major habitat types that support a wide variety of game, non-game, and migratory bird species?

2.2.12. Issue 12: Water, Wetlands, and Riparian

This section includes comments related to wetlands, water quality, in-stream flow, and State authorities relative to submerged lands and water quality. Comments related to wetlands pertained to meeting the requirements under Executive Orders and section 404 of the Clean Water Act. Comments recommended collection of baseline data and monitoring to allow for adaptive management that would protect water quality given decisions in the RMP and possible changes to the hydrologic regime due to climate change. The Draft RMP/EIS should include measures to avoid impacts to water quality, an analysis of potential impacts, and how impacts would be minimized and mitigated. The U.S. Fish and Wildlife Service stressed the importance of maintaining water quality and quantity in anadromous streams that are critical for providing subsistence resources for villages within or near the planning area and in streams draining into the refuges.

Internally generated scoping questions related to water, wetlands, and riparian habitat include:

- Are any watersheds in the planning area in need of special protection?
- What are the desired conditions for floodplains and riparian-wetlands and what are the measurable performance standards that will be used to determine if the desired conditions are being achieved and maintained?
- Are there any watersheds that are currently not meeting desired conditions?
- What actions should the BLM take to make sure that state and federal water quality requirements are met (including consideration of both point and non-point sources of pollution)?
- How will the ecological processes and disturbance regimes that are necessary for the development and maintenance of desired floodplain and riparian-wetland function be conserved?
- Floodplains and riparian-wetlands are some of the most biologically productive and diverse lands managed by the BLM and play a fundamental role in providing ecosystem services to humans. How will this role be preserved?
- How will the temporal and long-term loss of floodplain and riparian-wetland function be mitigated in cases where these resources are adversely impacted by land uses?

2.2.13. Issue 13: Wilderness Characteristics

Comments in this category focused on wilderness characteristics inventory, management of lands with wilderness characteristics, selection of lands to be managed for wilderness characteristics, range of alternatives, general support for and opposition to lands with wilderness characteristics, and relationship to ANILCA.

Regarding inventory, comments requested that the BLM inventory the planning area for wilderness characteristics and make the inventory available to the public before publication of the

Draft RMP/EIS. Another comment noted that the inventory will provide important data on the baseline condition of the planning area and can be used to inform future restoration efforts.

Comments related to management ranged from general recommendations to maintain the wild nature of these areas to specific recommendations on how to manage particular activities. Some commenters identified activities they considered incompatible wilderness characteristics such as mining, summer off-road use of motorized vehicles, roads, and highly developed recreation facilities. They noted that construction of new structures and facilities should only be allowed if needed for preservation or enhancement of wilderness characteristics, or for management of other permitted uses. Alternatively other comments noted that the BLM is not allowed manage lands for the non-impairment standard because of exemptions in section 1320 of ANILCA. Additionally, lands with wilderness characteristics should not be managed more restrictively than ANILCA conservation units.

Some comments noted that when selecting lands to be managed for wilderness characteristics, the BLM needs to consider other factors that may affect manageability such as land status, mineral ownership, valid existing rights, and access to non-federal inholdings or adjacent lands. Doyon, Limited noted its need for access through BLM-managed lands to corporation lands. Native corporations are entitled to access under ANILCA and granting such access could limit the BLM's ability to effectively protect wilderness characteristics. Doyon additionally noted its opposition to lands with wilderness characteristics surrounding or adjacent land owned by Doyon.

Internally generated scoping questions related to wilderness characteristics include:

- Which areas should be managed to preserve wilderness characteristics and what decisions are necessary to accomplish this?
- For authorized activities, what conditions of use are necessary to avoid or reduce impacts to wilderness characteristics?

2.3. Management Concerns

Some of the comments were categorized as management concerns rather than issues. Generally a management concern is of note to a few individuals or is less controversial than a planning issue. These management concerns will be addressed by the RMP as required by the BLM Planning Handbook, but are not likely to lead to new alternatives.

Air Resources

Comments on air resources were related to the analysis of impacts in the EIS from decisions proposed in the RMP alternatives. Comments noted that the RMP/EIS should: quantify and disclose anticipated greenhouse gas emissions from proposed planning decisions; discuss mitigation measures to reduce green house gas emissions; analyze impacts from oil and gas decisions per the Interagency Memorandum of Understanding for Air Quality Analysis and Mitigation for Federal Oil and Gas Decisions (June 2011); provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards, and criteria pollutant non-attainment areas in the planning area; estimate emissions of criteria pollutants; and specify emission sources and quantify emissions.

Internally generated scoping questions related to air resources included:

- What are the desired outcomes for air quality?

- What restrictions are needed on emission-generating activities to meet Clean Air Act requirements?

Cultural Resources

Comments on cultural resources focused on inventory and preservation of cultural resources and consultation with local tribal governments. Some comments noted important cultural sites in the planning area. Comments noted that the BLM should: provide specific management actions to protect, conserve, and restore cultural resources; conduct inventory of cultural and historic sites with an emphasis on areas most vulnerable to impact; adopt measures to protect resources from collection and vandalism; develop a cultural resource management plan; recognize traditional land use areas that are culturally significant to local tribes; and provide enduring protection of the Mesa Site. Comments also noted that the BLM should consult with tribal governments to determine whether there are sites of traditional religious and cultural significance and avoid impacting these sites.

Internally generated scoping questions related to cultural resources included:

- What traditional cultural properties exist within the planning area?
- What measures should be taken to proactively manage, protect, and use cultural resources, including traditional cultural properties?
- What special cultural resource restrictions exist that may affect the location, timing, or method of development or use of other resources in the planning area?
- What are the area-wide criteria for recognizing potential cultural resource conflicts?

Paleontology

One comment noted the presence of paleontological resources in the Atigun River area and cited this as a potential outstandingly remarkable value of the river.

Internally generated scoping questions related to paleontological resources included:

- What criteria or use restrictions are needed to ensure that areas containing, or that are likely to contain, vertebrate or noteworthy occurrences of invertebrate or plant fossils are identified and evaluated prior to authorizing surface disturbing activities?
- What criteria or use restrictions are needed to ensure management that promotes the scientific, educational, and recreational uses of fossils?
- What threats to paleontological resources exist and how can they be mitigated?

Economics

Comments in this category addressed a wide range of concerns including local economic conditions, the process for analyzing economic impacts in the EIS, subsistence-based economies, effects of climate change on the economy, and the potential contribution of various land uses to the economy. Many of the comments overlapped with other categories, reflecting the overarching nature of economic issues.

Internally generated scoping questions related to economics included:

- What are economic, demographic, and social conditions and trends in the planning area?
- What changes in economic, demographic, and social conditions and trends are expected to result from planning decisions?

- If recreation activities and associated facilities change, what will be the economic benefit or cost?
- If the BLM changes the off-highway vehicle designations, what will be the economic effect in terms of facilities necessary to support public use?
- What are the economic effects if land is transferred to the State, and development occurs?

Fire Management and Ecology

Comments on fire management focused on safety, economics, impacts of climate change, the natural role of fire, and on-the-ground fire management practices. Several comments noted that fire suppression practices may need to be altered to address climate change and increased levels of land use, such as the proposed Umiat Road. Others noted that communities in the planning area are interested in harvesting wood to support biomass projects and that this may lead to a need for a higher level of fire protection. The effects of fire on caribou habitat were of concern. Some comments noted that the RMP must recognize the important ecological role of wildland fire and allow for prescribed fire. Safety concerns included the effects of smoke and providing for firefighter safety, including the use of aerial retardant to create firefighter safety areas. Fire was also seen as creating jobs in areas with limited employment opportunities.

Internally generated scoping questions related to wildland fire included:

- What are the desired fire regime and condition class?
- What fire management objectives will support the goals and objectives for vegetation, wildlife, and other resources?
- Where should wildland fire be allowed to burn for resource benefit?
- What types of fuels management or vegetation treatments would be implemented and where (mechanical, biological, chemical, or prescribed fire)?
- Where are restrictions on fire management practices needed to protect natural or cultural resource values?
- What areas need a more site-specific fire management plan?

Forest and Woodland Products

Comments in this category focused primarily on firewood and harvest of biomass for heating. Many comments noted that the BLM-managed lands should be available for firewood harvest by individuals. Several communities also noted an interest in looking at alternative energy sources, including woody biomass. Other comments noted that the RMP should define areas suitable for timber harvest and develop appropriate best management practices to minimize impacts of harvest on fish, wildlife, soils, and vegetation. One comment was in opposition to the authorization of commercial berry picking on public lands.

Internally generated scoping questions related to forest and woodland products included:

- Where would the subsistence, personal, and commercial harvesting of timber products (house logs, firewood, saw logs) be allowed and under what conditions?
- Where would the subsistence, commercial, and personal harvest of special forest products (mushrooms, berries, bark, etc.) be allowed and under what conditions?

Fluid Minerals

Comments in this category include those on geothermal, oil, and gas resources. These are fluid minerals covered by the Mineral Leasing Act. Currently most of the BLM-managed lands are closed to the mineral leasing laws by public land orders issued in the early 1970s. Modification of these public land orders is covered by Issue 5, ANCSA Withdrawals.

All geothermal comments came from the State of Alaska. The State has an active geothermal resources exploration and development program that has potential for growth in the planning area. The State recommends the entire planning area be open to geothermal exploration and leasing. Comments also identified known geothermal areas within the planning area.

Comments on oil and gas focused on development of best management practices, consideration of cumulative impacts and an appropriate range of alternatives in the EIS, allocation of lands for fluid mineral leasing, coordination with other agencies, and availability of data for petroleum resources. Comments on best management practices included use of the best technology, minimizing the footprint of development sites, restoration standards, and development of mandatory best management practices and performance standards. One comment recommended development of leasing stipulations that could not be waived. Several comments noted that roads are not essential for oil and gas development and the EIS should include roadless alternatives. Some comments expressed concern over the potential use of fracking.

Some comments noted that petroleum resources in the planning area have not been definitively delineated, and lack of information should not be used to restrict allocation of lands available for leasing. Others said basins with potential should be open to exploration and leasing. Alternatively, other comments indicated that cumulative impact analysis should inform the manner in which the BLM allocates lands as available for leasing. Some said prohibiting leasing in some areas would help the BLM provide a balance of uses.

Coordination with other agencies was stressed in several comments. The Environmental Protection Agency recommended close coordination with the Alaska Regional Response Team, particularly regarding oil spill prevention and response. The State of Alaska had specific recommendations on coordination of project authorizations and mitigation efforts with non-federal landowners to provide regulatory consistency and to avoid restrictions that may negatively impact the State's oil and gas leasing programs.

Internally generated scoping questions related to oil, gas, and geothermal included:

- What areas are open to fluid mineral leasing? What areas are closed to fluid mineral leasing? Which lands currently closed to mineral leasing should be opened?
- What leasing stipulations and best management practices will be employed?
- What are the circumstances for granting an exception, waiver, or modification to a lease stipulation?
- Where and under what conditions should geophysical exploration occur?
- Should constraints identified in the RMP for new leases also apply to areas currently under lease?
- What are the long-term resource condition objectives for areas currently under development to guide reclamation activities prior to abandonment?

Lands and Realty

This section includes comments on land use permits, land conveyance, land tenure (land sale, acquisition, or exchange), utility corridors, rights-of-way, designation of development nodes on the Dalton Highway, 17b easements, withdrawals, and potential transfer of lands to other federal agencies.

There were many comments and questions from the public about conveyance of land to the State and Native corporations. Some comments noted that selected lands should be managed in a manner similar to the State or Native corporation lands, and the RMP should not encumber selected lands, as they may be conveyed during the life of the plan. The USFWS indicated an interest in developing cooperative management with the BLM for some isolated parcels near refuges. There was also interest in some parcels of BLM-managed land being transferred to the refuges or national parks. There were several comments specific to the strip of land extending east from the Dalton Highway toward Venetie such as: it should be closed to mining, incorporated into the Yukon Flats Refuge, or managed by USFWS under a Memorandum of Understanding.

The State requested that the BLM work with it to resolve issues concerning ownership of specific waterbodies and on State-asserted navigable waterways, and not make changes in management until the matter of navigability is settled.

There were also many comments on management of the Utility Corridor. Most comments favored maintaining the current development nodes, but not allowing any new development nodes. One comment indicated that the Chandalar Shelf development node should be dropped, as there is not a strongly documented need for a node at this site, but there is a strong need to preserve the viewshed for the enjoyment of visitors.

Some comments were in opposition to right-of-way avoidance or exclusion areas, particularly where access to private inholdings, or to Native corporation and State land, is likely to be needed in the future. Other comments supported exclusion of rights-of-way in sensitive habitats. The need for the establishment and management of easements was noted.

Internally generated scoping questions related to lands and realty included:

- Which lands should the BLM make available for sale or exchange?
- Are there any lands the BLM should consider acquiring?
- Where are the existing and potential right-of-way corridors?
- Are there any areas that should be right-of-way avoidance or exclusion areas?
- What terms and conditions or best management practices should apply to right-of-way corridors or land use permits?

Public Safety and Environmental Justice

Comments in this category focused on environmental justice, health impact assessments, health benefits from public lands, and safety on the Dalton Highway. Comments related to environmental justice included: compliance with Executive Order 12898; the potential for disproportionate impacts on Alaska Natives, particularly in light of the low salmon returns on the Yukon River; the complexity of the planning process; and the difficulty for the general public to engage in the planning process. Several comments recommended that the BLM consider conducting a formal health impact assessment as part of the RMP/EIS. Many comments related to the health benefits

provided by recreating on public lands, particularly motorized recreation. Several comments noted the need for improved safety and better visitor management on the Dalton Highway.

Internally generated scoping questions related to public safety and environmental justice included:

- How will existing solid and hazardous waste sites affect the management plan?
- What restrictions should the BLM put on permits to prevent solid or hazardous waste contamination?
- What are the environmental justice populations in the planning area, and will there be any disproportionately high and adverse effects to these populations?

Soil Resources

Comments in this category focused on permafrost, erosion, and decommissioning of roads and trails. Several comments noted that the RMP should recognize the increased rate of thawing permafrost related to climate change; develop criteria for the design, engineering and operation of infrastructure on permafrost; and develop a monitoring plan. Many of the comments were specific to mining and mine-related infrastructure. Some comments noted potential environmental effects that should be analyzed in the EIS. Many comments related to motorized use: the EIS should not overestimate the effects of motorized use on soil erosion and sedimentation; existing roads that are decommissioned should be reconstructed into trails; and appropriate mitigation should be used to reduce erosion while still allowing the motorized public to use the area.

Internally generated scoping questions related to soil resources included:

- Are any soils in the planning area in need of special protection?
- What restrictions or best management practices should the BLM require for surface-disturbing activities to protect soils?

Special Status Species

Comments in this category noted that the RMP must identify any special status species within the planning area, describe critical habitats for these species, identify potential impacts for these species, and describe how the RMP will comply with Endangered Species Act requirements. The USFWS also recommended that the RMP incorporate the Service's draft raptor guidelines and rare plant best management practices.

Internally generated scoping questions related to special status species included:

- Where and in what numbers do special status species exist, what is the current condition of the populations, and what are the habitat needs of those species?
- What are the desired outcomes, strategies, restoration opportunities, use restrictions, and management actions needed to conserve and recover special status species?
- What information is needed to adequately assess impacts to special status plant and animal species, and botanical resources in support of permitting and monitoring activities for mineral development, recreation opportunities, and other uses?
- What management actions will benefit and conserve special status plant, animal, and fish species within the planning area?
- Are there specific management plans (such as conservation strategies or recovery plans) that need to be considered and incorporated during planning?
- How can the BLM work with partners and stakeholders to develop conservation strategies for special status species?

Vegetation

Public comments on vegetation focused on rare plants and the effects of climate change on the vegetation. Commenters noted that the RMP should: identify areas that support rare plants and manage these sites to minimize impacts; consider whether certain plant communities would be jeopardized by climate change, and if so, consider additional protection for these areas; and discuss the extent of vegetation removal and the effects of such removal, particularly on riparian areas or steep slopes. Comments related to vegetation may have also been classified under wetlands or riparian habitat.

Internally generated scoping questions related to vegetation included:

- What plant communities exist, in what amounts, and how are they distributed in the planning area?
- What are the desired conditions of the plant communities in the planning area?
- Are there unique botanical resources that should be considered for management actions to conserve their diversity?

Visual Resources

Comments on visual resources focused on selecting the appropriate visual resource management (VRM) class and assessing the impact of roads and trails on visual resources. One comment recommended VRM Class I be applied to all wild and scenic river corridors. Another noted that the visual impact of motorized and non-motorized trails are generally equal and that trails should be considered a natural part of the landscape. A third comment stated that the BLM needs to work closely with local communities when determining the VRM class for remote areas.

Internally generated scoping questions related to visual resources included:

- Are any of the visual values of a scarce nature?
- Are there locations where protection of visual resources should be a high priority?
- How can the BLM best reduce and mitigate impacts to visual resources?
- Given other resource uses, what visual resource management classes should be applied to establish land use allocation compatibility while protecting visual resource values?

2.4. Process Comments

The public raised many concerns regarding the planning process, impact analysis, public involvement, and layout of the Draft RMP/EIS. These comments will be considered during the planning process and in development of the Draft RMP/EIS, but will generally not contribute to the range of alternatives. Suggestions for improving outreach, public participation, consultation, and layout of the Draft RMP/EIS will be used to the extent possible during the remainder of the planning process. Some of the process comments are discussed below. For the remainder see Appendix A.

Government-to-Government Consultation

Several comments addressed government-to-government consultation. Comments asked for clarification on how the process works and noted that the Draft RMP/EIS should describe the process and outcome of consultation, including describing how issues raised during consultation were addressed. One comment recommended the use of alternative dispute resolution to ensure

successful outcomes from consultation. Other comments stressed the importance of effective communication, including two-way dialogue between the BLM and tribal governments. Some felt that, too often, it appears the BLM is dictating the outcome to the tribes, rather than listening and allowing the tribes to contribute input to decisions in the RMP.

Public Participation

The public offered many specific recommendations on improving public participation in the planning process. These included how to improve attendance at public meetings, maps, the website, advertising, and outreach. Some comments recommended ways to improve Section 810 subsistence hearings to better engage local residents, enhance understanding, and generate better feedback from participants.

Mitigation

Several comments addressed mitigation. These ranged from general comments to specific recommended mitigation measures such as prohibiting the use of chemical dust control agents or using stream buffers in high-value watersheds to minimize adverse impacts from surface disturbing activities. One comment recommended that the RMP consider the use of compensatory mitigation. Some comments noted that mitigation should be specific to each project and a one-size-fits-all approach is not appropriate. Other comments favored rigorous mitigation measures in the RMP with limited or no exceptions. The Draft RMP/EIS will include a discussion of mitigation and a list of standard operating procedures.

Planning and NEPA Process

The public reminded the BLM of the need to comply with BLM policy and planning guidance, and public laws. The ANILCA in particular, has many sections that constrain the BLM's decisions and the commenters noted the RMP needs to explicitly recognize applicable provisions of ANILCA as well as where possible use direct quotes when referencing it. Additionally noted was the need for the RMP to consider plans and policies of the State, adjacent landowners, and tribes. Also noted was the need to recognize the authorities of other agencies such as the Alaska Department of Fish and Game's authority over fish and wildlife populations. Allowing for access to State and Native corporation lands for resource development was stressed by many. On the other hand, many comments also recommended that the RMP prioritize subsistence and recreational use. Some comments recommended the use of adaptive management and landscape-scale planning.

The public had many questions about the planning process and how it works. Commenters asked for clarity and transparency on the comment periods, ways to comment, alternatives considered, and next steps in the NEPA process. Due to the size of the planning area and probable length of the Draft RMP, residents expressed the need for public involvement activities, return visits to their communities, and updates throughout the process. The public asked the BLM to keep them informed of the next steps in the NEPA process and requested information on how to access the scoping report and what would be the next opportunities to provide comments.

Many comments addressed the complexity of the project and how to make the Draft RMP/EIS more user friendly. Suggestions included the need to: provide summary documents and interactive maps on the website, host webinars, hold multiple meetings, and make inventories and data publicly available before the Draft RMP/EIS is released for public comment. The documents should be written in simple language and comply with CEQ recommendations on

length. Vocabulary and acronyms used should be commonly used and easily understood by all stakeholders. Some comments suggested that the BLM have a second round of public meetings and allow public input on draft alternatives, before issuing the Draft RMP/EIS. Many comments also discussed impact analysis and the need to address cumulative impacts.

Traditional Ecological Knowledge

Several comments addressed traditional ecological knowledge, noting that traditional knowledge could fill in the gaps in Western science and form a basis for determining future studies. Some noted a stigma against non-Western ways of knowing and a standard that Western science is the only way to document, monitor, and make decisions. Some said both science and traditional knowledge should be used to inform the RMP, fostering a stronger working relationships between the BLM and tribes. One comment noted that while traditional knowledge should be used along with other data in developing the RMP, it is not a management issue.

2.5. Anticipated Decisions

Section 102(a)(7) of the Federal Land Policy and Management Act (FLPMA) requires the BLM to manage public lands using the principles of multiple use and sustained yield. Section 102(a)(8) further requires that the public lands be managed in a manner that will protect the quality of the scientific, scenic, historic, ecological, environmental, air and atmospheric, water resources, and archeological values; that where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.

Management direction resulting from the planning process for the RMP will be adaptable to changing conditions and demands over the life of the RMP. The RMP will provide management direction and guide decision making to achieve desired outcomes, determine appropriate multiple uses, and allocate resources.

This scoping report does not make any decisions, nor does it change current management direction from the 1986 Central Yukon RMP or the Utility Corridor RMP. Instead it summarizes the issues identified during the scoping period. The BLM will use the issues summarized in this scoping report, along with subsequently identified issues, planning criteria, and other information, to help formulate a range of reasonable alternatives during the next phase of the planning process. Each identified alternative, including continuation of existing management practices, will represent a complete and reasonable plan for managing the Central Yukon Planning Area. Future decisions will occur at two levels: the RMP level and the implementation level. The BLM's analysis of identified alternatives will be documented in an EIS prepared as part of the RMP process, as required by the National Environmental Policy Act.

Future Resource Management Plan Level Decisions

RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide actions for the coming decades within the planning area. The RMP will provide a comprehensive yet flexible framework for managing the resources located on BLM-managed lands and the use of those resources. There are two broad categories of RMP-level decisions: desired outcomes and allowable uses.

Desired outcomes will be expressed in terms of specific goals, standards, or objectives. Goals are broad statements of desired outcomes, such as ensuring sustainable development. Standards are descriptions of conditions or the degree of function required, such as land health standards. Objectives are specific, quantifiable, and measurable desired conditions for resources.

Allowable uses and actions to achieve desired outcomes will be expressed in the RMP as allowable uses, actions needed, and land tenure decisions. Administrative designations (for example, Areas of Critical Environmental Concern), off-highway vehicle designations, and identification of lands suitable for exchange or disposal are examples of some RMP-level decisions in this category.

Future Implementation-level Decisions

The RMP will contain broad-scale decisions that guide future land management actions. Subsequent site-specific implementation, often characterized as project- or activity-level decisions, will require the BLM's final approval of on-the-ground actions. Implementation decisions generally require a more-detailed, site-specific environmental analysis that tiers to the EIS prepared for the RMP. These decisions generally constitute final approval of on-the-ground actions to proceed (BLM Land Use Planning Handbook H-1601-1, Section IV [B] [BLM 2005]). An example of an implementation decision is the development and management of a recreation site. They may be incorporated into implementation plans (activity or project plans) or may exist as stand-alone decisions.

Implementation decisions may occasionally be included in the RMP. In these cases, the decisions will be identified as implementation decisions in the record of decision. Examples of implementation decisions that could be included in the RMP include site-specific management actions and constraints for Areas of Critical Environmental Concern (ACEC) rather than delaying these decisions to an ACEC Management Plan.

Special Designations

The RMP will determine eligibility and potential classification and suitability of stream segments for inclusion in the National Wild and Scenic Rivers System. The RMP will also evaluate potential Areas of Critical Environmental Concern for eligibility and suitability. Those carried forward into the record of decision will become designated Areas of Critical Environmental Concern.

2.6. Issues Raised that Will Not Be Addressed

Some issues or management concerns raised by the public were outside the scope of the RMP, are better addressed through administrative actions than land use planning, are not timely for consideration, or are outside of the BLM's authority. Unless additional information obtained during development of the alternatives indicates otherwise, the concerns discussed below will likely not be addressed in the RMP.

Coal Leasing

It is likely that a decision on coal leasing will be deferred in the RMP because the required coal screening process (as identified by 43 CFR 3420.1-4) has not been completed in the planning area. In the absence of interest from the industry or applications for coal leases, there is no demonstrated need to complete the coal screening process at this time.

Resolution of R.S. 2477 Rights-of-Way

Under R.S. 2477, Congress granted a right-of-way for the construction of highways over unreserved public land. Under Alaska law, the grant could be accepted by either a positive act by the appropriate public authorities or by public use. "Highways" under Alaska law include roads, trails, paths, and other common routes open to the public. Although R.S. 2477 was repealed in 1976, a savings clause preserved any existing R.S. 2477 rights-of-way. The State of Alaska claims numerous rights-of-way across federal land under R.S. 2477, including those identified in AS 19.30.400. The validity of State-identified R.S. 2477 rights-of-way will be determined outside of the planning process.

Ambler and Umiat Roads

There were many comments on the Ambler and Umiat road projects. These are ongoing projects that are currently being evaluated. These projects could potentially be approved under the existing Utility Corridor RMP, prior to a ROD on the Central Yukon RMP. If not approved before the record of decision (ROD) for the Central Yukon RMP, these projects would be considered during implementation of the Central Yukon RMP.

These road projects will be addressed in the cumulative impact analysis in the Draft RMP/EIS as reasonably foreseeable future actions, but approval and site-specific impact analyses for these projects will occur outside of the RMP process. In a broader sense, however, the RMP may consider designation of transportation or utility corridors as a means of directing where such facilities, if proposed and approved, would best be located.

Central Arctic Management Area WSA

Some comments on the Central Arctic Management Area Wilderness Study Area (CAMA WSA) stated that the BLM: should not approve State selection of any lands in the WSA; retain all remaining lands as a WSA; and provide rationale for removing any lands from an established WSA. Section 1001(f) of ANILCA states that "Nothing in this Title [Title X] shall be construed as impeding, delaying, or otherwise affecting the selection and conveyance of land to the State pursuant to the Alaska Statehood Act, or any other Federal law referred to in Section 102(3)(A) of this Act...". This section applies to the CAMA WSA. Therefore, the BLM will continue to convey validly selected lands within WSA as required by section 1001(f) of ANILCA.

2.7. Valid Existing Management

2.7.1. Central Arctic Management Area Wilderness Study Area

The planning area includes the CAMA WSA. American Rivers and several other conservation organizations filed a lawsuit after the 1991 record of decision was issued for the Utility Corridor RMP. This suit challenged the BLM's interpretation of the wilderness management requirements in sections 1001 and 1004 of ANILCA. In an August 1993 Settlement Agreement, the BLM agreed to manage lands west of the Killik River in a manner that would protect their wilderness values until Congress acts on the wilderness recommendation. These lands are the CAMA WSA. The BLM's study found that the 41,000-acre Upper Nigu River area was suitable for inclusion in the National Wilderness Preservation System, while other lands in the WSA were found unsuitable.

The CAMA WSA will be managed consistent with BLM Manual 6330 Management of *BLM Wilderness Study Areas*, relevant provisions of ANILCA, and the provisions of the 1993 Settlement Agreement until Congress acts on the BLM's wilderness recommendation or releases these lands from consideration.

Comments related to the CAMA were coded to the Special Management Areas category. Some comments noted that the BLM should continue to manage the area as a wilderness study area and ensure that wilderness values are maintained until Congress acts on the wilderness recommendation, and that it would be inappropriate to evaluate management scenarios in the RMP on how to manage these lands if they are released from wilderness consideration by Congress. Alternatively, the State noted that ANILCA section 1320 specifically exempts BLM-managed lands in Alaska from section 603 of the Federal Lands Policy Management Act. Therefore, the BLM is not allowed to manage lands recommended for wilderness designation to the non-impairment standard and instead is directed to manage in accordance with applicable land use plans.

2.8. Special Designations

2.8.1. Areas of Critical Environmental Concern

Areas of Critical Environmental Concern (ACECs) are areas where special management attention is needed to protect important resources or to protect human life and safety from natural hazards. ACECs must meet the relevance and importance criteria in 43 CFR 1610.7-2(b) and must require special management to: protect the area and prevent irreparable damage to resources or natural systems; or protect life and promote safety in areas where natural hazards exist.

2.8.1.1. Designated Areas

Under the current plans, the BLM has designated 24 ACECs in the planning area. At the time of scoping, the planning area included the Nulato Hills Subunit. Since the time of this report, the BLM adjusted the planning area boundary. As a result, the BSWI RMP will analyze continued designation of the six ACECs in the Nulato Hills subunit listed in the table below.

Table 2.3. Areas of Critical Environmental Concern in the Central Yukon Planning Area

Land Use Plan	Proposed Subunit ^a	ACEC Name	Size (acres) ^b	Reason for Designation
Central Yukon RMP	Middle Yukon Drainages	Dulbi-Kaiyuh Mountains Subunit ACEC	201,800	Crucial peregrine falcon habitat
Central Yukon RMP	Middle Yukon Drainages	Galena Mountain ACEC	19,400	Crucial peregrine falcon habitat; caribou calving grounds
Central Yukon RMP	Nulato Hills ^c	Gisasa River ACEC	278,100	Salmon spawning habitat
Central Yukon RMP	Middle Yukon Drainages	Hogatza River Tributaries ACEC	25,100	Salmon spawning habitat
Central Yukon RMP	Middle Yukon Drainages	Indian River ACEC	158,000	Chinook and chum salmon spawning habitat
Central Yukon RMP	Nulato Hills ^c	Inglutalik River (CY) ^d ACEC	71,700	Salmon spawning habitat

Land Use Plan	Proposed Subunit ^a	ACEC Name	Size (acres) ^b	Reason for Designation
Central Yukon RMP	Nulato Hills ^c	Kateel River ACEC	568,100	Salmon spawning habitat
Central Yukon RMP	Middle Yukon Drainages	Nulato Hills (CY) ACEC	40,700	Crucial peregrine falcon habitat
Central Yukon RMP	Nulato Hills ^c	Shaktoolik River (CY) ACEC	193,300	Salmon spawning habitat
Central Yukon RMP	Middle Yukon Drainages	Sulukna River ACEC	10,200	Salmon and sheefish (inconnu) spawning habitat
Central Yukon RMP	Middle Yukon Drainages	Tozitna River ACEC	851,200	Salmon spawning habitat
Central Yukon RMP	Utility Corridor	Tozitna Subunit North ACEC	129,000	Crucial caribou calving habitat
Central Yukon RMP	Middle Yukon Drainages	Tozitna Subunit South ACEC	62,600	Crucial caribou calving habitat
Central Yukon RMP	Nulato Hills ^c	Unalakleet River ACEC	278,400	Salmon spawning habitat
Central Yukon RMP	Nulato Hills ^c	Ungalik River (CY) ACEC	112,700	Salmon spawning habitat
Utility Corridor	Utility Corridor	Galbraith Lake ACEC	53,900	Cultural, rare or sensitive plants, scenic values, and Dall sheep lambing areas
Utility Corridor	Utility Corridor	Jim River ACEC	200,000	Fishery, recreation, cultural
Utility Corridor	Utility Corridor	Kanuti Hot Springs ACEC	43	Hot spring
Utility Corridor	Utility Corridor	Nigu-Iteriak ACEC	39,700	Geology, cultural
Utility Corridor	Utility Corridor	Nugget Creek ACEC	3,300	Dall sheep lambing areas, mineral lick
Utility Corridor	Utility Corridor	Poss Mountain ACEC	8,700	Dall sheep lambing areas, mineral lick
Utility Corridor	Utility Corridor	Snowden Mountain ACEC	29,700	Dall sheep lambing areas, mineral lick
Utility Corridor	Utility Corridor	Sukakpak Mountain ACEC	3,500	Scenic, geology
Utility Corridor	Utility Corridor	West Fork Atigun River ACEC	9,200	Dall sheep lambing areas, mineral lick

^a As currently proposed

^b Rounded to nearest 100 acres

^c Transferred to the BSWI RMP

^d ACECs notated with (CY) indicate those that extend into the Kobuk-Seward Peninsula Planning Area

The current land use plans also led the BLM plans to designate nine research natural areas (RNAs) in the planning area. Considered by the BLM to be a type of ACEC, RNAs are established and maintained for the 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 (43 CFR 8223). Due to the planning area boundary change, one RNA, Box River Treeline RNA will be considered in the BSWI RMP.

Table 2.4. Existing Research Natural Areas (RNAs) in the Central Yukon Planning Area

Resource Management Plan	Proposed Subunit	RNA Name	Size (acres)	Reason for Designation
Central Yukon RMP	Middle Yukon Drainages	Arms Lake RNA	10,590	Sand dune complex and associated vegetation and limnologic characteristics
Central Yukon RMP	Nulato Hills	Box River Treeline RNA ^a	13,331	Vegetation complex representing western treeline limit in Alaska. Permafrost features.
Central Yukon RMP	Middle Yukon Drainages	Ishtalitna Creek Hot Springs RNA	1,056	Low-gradient hot springs system.
Central Yukon RMP	Middle Yukon Drainages	Lake Todatonten Pingos RNA	658	Open system pingos
Central Yukon RMP	Middle Yukon Drainages	McQuesten Creek RNA	3,930	Low-gradient hot springs system. Geologic features: stone stripes and surface slumps.
Central Yukon RMP	Middle Yukon Drainages	Redlands Lake RNA	3,829	Remnant lake and sand dune complex
Central Yukon RMP	Middle Yukon Drainages	South Todatonten Summit RNA	655	Open system pingos
Central Yukon RMP	Middle Yukon Drainages	Spooky Valley RNA	8,842	Geologic, physiographic, vegetation, and scenic
Utility Corridor RMP	Utility Corridor	Toolik Lake RNA	82,800	Research activities, cultural

^a Transferred to the BSWI RMP

2.8.1.2. Nominations

Section 202 (c)(3) of the Federal Lands Policy Management Act mandates that the BLM give priority to the designation and protection of ACECs in the development and revision of land use plans. Nominations for ACECs are accepted during the public scoping period. The BLM specifically requested nominations for ACECs from May 1 through August 29, 2014. Nominations for new and expanded ACECs were received during both scoping and the ACEC nomination period. All nominations received by September 2, 2014, are included in this report. Nominations will be evaluated in an ACEC report to be published in the future.

The BLM also received comments on the ACEC nomination and evaluation process. These comments are included in Appendix A. In general these comments noted:

- ACECs should not be evaluated through a separate step in the planning process.
- There has been inconsistent use of ACEC designations in BLM planning efforts statewide, reflecting a lack of clear criteria as to what justifies an ACEC designation.
- Many existing ACEC and RNA designations are not justified because existing State and federal regulations provide sufficient protection.
- When making existing designations, the BLM often failed to adequately consider the mineral resources of the areas designated.
- ACECs unnecessarily restrict access to, and exploration of and development of mineral resources.

- The BLM has failed to follow through on provisions of past plans (such as the Central Yukon RMP) that called for revocation of land withdrawals within many existing ACECs.
- Large parts of some ACECs have been conveyed to the State or Native corporations and are no longer under BLM management. The BLM should consider eliminating the Hogatza ACEC and possibly others due to changes in land status since designation.
- The BLM should not establish ACECs on selected or top-filed lands.

The following areas have been nominated for consideration as ACECs or RNAs by the public, tribes, or government agencies during the scoping period or during the extended ACEC nomination period. These areas will be evaluated to determine whether they meet the criteria for designation under 43 CFR 1610.7-2. Areas determined to meet the criteria will be considered as potential ACECs in the Draft RMP/EIS.

Table 2.5. ACEC Nominations for the Central Yukon Planning Area

Proposed Subunit	ACEC Name or General Location	Size (acres)	Nominated By	Reason for Nomination
Utility Corridor	Upper Chandalar River between Yukon Flats NWR and State lands; Chandalar River from East Fork to confluence with Schilling Creek; Mouth of Chandalar River and East Fork; Thazzik Mountain	45,400 - 294,700	USFWS, BLM, Mr. Gilbert	Essential habitat for Chinook, summer and fall chum, coho, whitefish, and cisco; contributes an estimated 4 percent of Yukon River Chinook salmon stock; accounts for 25 to 30 percent of Yukon River fall chum run; critical subsistence resources; likely area of cultural significance; high-value cultural resource for Alaska Natives particularly for moose hunting; sensitive to adverse change.
Utility Corridor	Upper Kanuti River watershed	231,800	USFWS	Significant cultural resource site; historical territory to three tribal bands of aboriginal Alaska Natives; sensitive or rare plants; Hodzana Caribou Herd; rare or undescribed floral communities; geology.
Utility Corridor	Kanuti-Kilolitna River; Torment and Ishtalitna creeks	268,200	USFWS	Significant cultural resource site; historical territory to three tribal bands of aboriginal Alaska Natives; sensitive or rare plants; Hodzana Caribou Herd; rare or undescribed floral communities; geology.
Utility Corridor	Expand Jim River ACEC; Jim River and S. Fork Koyukuk River	251,400	Allakaket	Cultural significance to people of Allakaket; salmon spawning habitat.
Utility Corridor	Midnight Dome/ Kalhabuk Mountain	10,000	Mr. Reakoff	Critical Dall sheep habitat and mineral lick; Dall sheep movement corridor.
Utility Corridor	Atigun-Sagavanirktok River	104,800	USFWS	Scenic values; geology; paleontological resources; Dall sheep lambing habitat and mineral licks.
Utility Corridor	Accomplishment Creek, tributary to Sagavanirktok River	41,000	BLM	One of a relatively small number of streams flowing into the Arctic Ocean that provides reliable ground water flow through the winter. Such flow is essential to the survival of Dolly Varden.

Proposed Subunit	ACEC Name or General Location	Size (acres)	Nominated By	Reason for Nomination
Middle Yukon Drainages	Alatna River; T16N, R25E, Kateel River Meridian	5,470	USFWS	Prime spawning habitat supporting the main subsistence fishery resources for villages in the Upper Koyukuk River. Whitefish spawning. Only documented spawning area in upper Koyukuk drainage for inconnu and broad white fish.
Middle Yukon Drainages	Pah River watershed	12,000	Ambler Native Village	Cultural importance to Upper Kobuk River communities. Important sheefish and chum spawning. Sheefish considered genetically unique population. Western Arctic Caribou Herd migration route. Waterfowl. Unique wetlands.
Middle Yukon Drainages	Telsitna, Titna, and Sethkokna rivers	72,800	USFWS	Critical spawning and rearing habitat for chinook salmon; primary producer of Chinook within the Nowitna River drainage; preserve water quality in the Nowitna NWR.
Middle Yukon Drainages	Sethkokna River	298,174	BLM	Chinook salmon spawning habitat.
Middle Yukon Drainages	Sulukna River	33,000	USFWS	Critical spawning and rearing habitat for sheefish; preserve water quality in the Nowitna NWR.
Middle Yukon Drainages	Mentanontli River/Lake Todatonten	22,000	USFWS	Wildlife and waterfowl habitat; critical feeding habitat for humpback whitefish; whitefish migration route from Lake Todatonten to riverine habitats in the Upper Koyukuk River drainage.
Middle Yukon Drainages	Dakli and Wheeler creeks	25,500	USFWS	Critical spawning and rearing habitat for chum salmon; major producer of chum salmon in the Koyukuk River drainage.
Middle Yukon Drainages	Wheeler Creek, tributary to Dakli River	146,800	BLM	high-value summer chum salmon spawning habitat.
Middle Yukon Drainages	Watersheds of the Yukon, Koyukuk, and Yuki rivers and their tributaries.	1,522,607 ^a	Louden Tribal Council	Traditional harvest lands and waters used by the Louden Tribe; cultural and historical significance of the area to Louden people; ecological processes that support traditional harvest practices.
Middle Yukon Drainages	South Fork Koyukuk River	673,491	BLM	Chinook and chum salmon spawning habitat.
Middle Yukon Drainages	Klikhtentotzna Creek, tributary upper Hogatza River	108,000	BLM	high-value summer chum salmon spawning habitat.
Middle Yukon Drainages/ Nulato Hills	Kateel River ^b	311,700	Koyukuk Tribal Council	Traditional subsistence use areas for indigenous Koyukuk people; abundance, health, and accessibility of wildlife that the people have traditionally depended upon; cultural significance of the area to the Koyukuk people.
	Yukon River watersheds	186,100		
	Gisasa River ^b	223,100		
	Honhosa River ^b	93,700		
	Bishop Creek	16,200		
Nulato Hills	Kateel River watershed ^b	675,600	USFWS	Important spawning and rearing habitat for adult chinook and chum salmon; preserve water quality in the Koyukuk NWR.

Proposed Subunit	ACEC Name or General Location	Size (acres)	Nominated By	Reason for Nomination
Nulato Hills	Gisasa River ^b	277,800	USFWS	Critical spawning and rearing habitat for chinook and chum salmon; preserve water quality in the Koyukuk NWR.
Nulato Hills	Nulato River ^b	368,700	Nulato Tribal Council	Cultural significance of the area to the Nulato people; salmon and sheefish spawning habitat; subsistence access and maintenance of subsistence resources.
Nulato Hills	Tagagawik watershed ^b	301,000	Pew Trust	Ecosystem services; rare and sensitive species; high level of resilience climate change; high biodiversity; and landscape connectivity.

^aThe vast majority of this acreage is not on BLM-managed lands

^bTransferred to the BSWI RMP

In addition to nominations for new areas, several existing ACEC/RNAs were recommended for expansion. Inventory done since designation of the existing ACECs has shown that some do not encompass the habitats that they were intended to protect. There were numerous comments in support of expanding the Toolik RNA to accommodate research activities and retaining the Galbraith Lake ACEC.

Table 2.6. Nominated Expansion of Existing ACECs

Proposed Subunit	ACEC Name	Est. Size (acres) ^a	Nominated By	Reason for Nomination
Middle Yukon Drainages	Hogatza River ACEC	62,000	BLM	The original ACEC designation does not include all the high-value summer chum spawning habitat in the watershed. Because of the high-value salmon habitat found within the combined drainages of Clear, Caribou, and High creeks, it is recommended that the current boundary of the Hogatza ACEC be adjusted to include the remaining BLM-managed lands within the combined watersheds of Clear and Caribou creeks as well as the adjoining BLM-managed land in High Creek and the South Hogatza sub-watershed. Additional acreage of approximately 36,000 acres.
Middle Yukon Drainages	Sulukna River ACEC	374,000	BLM	The Sulukna River ACEC was designated to protect inconnu spawning habitats. Further studies conducted after designation document that the majority of the fish are spawning upstream of the current ACEC. Based on the presence of this rare habitat (only five known inconnu spawning areas within the Yukon River Basin), it is suggested that the entire Sulukna River watershed upstream of the Nowitna River National Wildlife Refuge be included into the existing ACEC. Additional acreage is estimated to be 350,000 acres.
Middle Yukon Drainages	Indian River ACEC	192,000	BLM	The Indian River ACEC was designated to protect Chinook and summer chum salmon spawning habitat. More recent inventories determined that a substantial number of summer chum salmon spawned in the Indian River downstream of the lowermost ACEC boundary. Additional acreage is estimated to be 23,680 acres (10 additional miles of the Indian River).

Proposed Subunit	ACEC Name	Est. Size (acres)^a	Nominated By	Reason for Nomination
Middle Yukon Drainages	Galena Mountain ACEC	670,600	BLM	Consider combining the two Galena Mountain ACEC polygons into one larger ACEC to protect core habitat for the Galena Mountain Caribou Herd. This herd is approximately 125 animals and in decline. Rename this area as the Galena-Wolf Mountain Caribou ACEC.
Middle Yukon Drainages	Tozitna North and South ACECs	922,600	BLM	These areas were designated to protect calving habitat for the Ray Mountains Caribou Herd. Subsequent data acquired through regular radio-tracking efforts by the BLM and ADFG suggest that calving occurs in a much broader area. The area should be renamed as the Ray Mountains ACEC to reduce confusion with the similarly named Tozitna River ACEC.
Nulato Subunit	Kateel River ACEC	874,000	BLM	The Kateel River ACEC was designated to protect Chinook and summer chum salmon spawning habitat and included the upper watershed. Additional inventory conducted since designation shows the area downstream of the original ACEC is being used by salmon for spawning. It is recommended that the ACEC be expanded to include the lower watershed. Additional acreage would be approximately 323,000 acres.
Utility Corridor	Jim River ACEC	300,000	BLM	The Jim River ACEC was designated in part to protect Chinook and chum spawning habitat and overwintering habitat for resident fish. Additional research since establishment of the ACEC has documented the lower Jim River as important spawning and overwintering habitat for grayling. The lower portion of the river is also used by Chinook and chum salmon as spawning habitat. Given the high-value of the aquatic resources and habitat in the lower Jim River, inclusion of this portion of the watershed into the ACEC is recommended. Additional acreage would be approximately 99,934 acres.
Utility Corridor	Snowden Mountain ACEC	97,200	BLM	The Snowden Mountain ACEC was designated to protect Dall sheep habitat, mineral licks, and unique geological exposures and associated paleontology. The current ACEC does not include the headwaters of Mathews River, which is frequently used by sheep. While the established ACEC is situated along the western slope of the Snowden Mountain massif, more sheep activity was found to occur on the northern and eastern slopes of that ridge, east of the ACEC boundary. To adequately protect important sheep habitat, consider extending the boundary of the Snowden ACEC eastward to the boundary of BLM-managed land near Mathews River. Abundance survey results from 2012 to 2014 suggest reduced lamb production in this region; therefore there is a high likelihood of reduced abundance in all sheep cohorts in future years, underscoring the importance of protecting sheep habitat to the greatest extent possible. This area includes Nutirwik Creek, which is noted for its scenic values, including wide floodplains with narrow stream channel, major outcropping of the Skajit Limestone on Table Mountain, and In season two high waterfalls at the headwaters.

Proposed Subunit	ACEC Name	Est. Size (acres) ^a	Nominated By	Reason for Nomination
Utility Corridor	Poss Mountain ACEC	25,500	BLM	The Poss Mountain ACEC was designated to protect lambing habitat for Dall sheep and known mineral licks. Consider extending the Poss Mountain ACEC to the north to encompass the Gold Creek mineral lick and to the south to include the Minnie Creek drainage. The Minnie Creek area is regularly used by this population, and mineral licks are essential to sheep health. Abundance survey results from 2012 to 2014 suggest reduced lamb production in this region; therefore there is a high likelihood of reduced abundance in all sheep cohorts in future years, underscoring the importance of protecting sheep habitat to the greatest extent possible.
Utility Corridor	Sukakpak Mountain ACEC	18,700	BLM	Sukakpak Mountain ACEC was designated to protect unique geologic structures, folds, and faults; view of the geologic process of mountain building and erosional forces; rare plant species; and outstanding scenic views along the Dalton Highway. The highway is increasingly seen and marketed globally as a unique Alaskan destination. The Dalton Highway Scenic Byway Corridor Partnership Plan (2010) identifies Sukakpak Mountain as “a dominant feature along this stretch of the highway...” To protect more of this spectacular view, it is recommended that the boundary of the Sukakpak Mountain ACEC be adjusted to include more land to the west, south, and north. This adjustment would also protect the scenic view of Dillon Mountain, a spectacular 4,820-foot peak on the opposite side of the Bettles River from Sukakpak Mountain and additional permafrost and geological features. The boundary adjustment would add 15,200 acres to the ACEC.
Utility Corridor	Toolik Lake RNA expansion	113,300	Toolik Field Station Management Committee	Research in the RNA has expanded significantly since designation. There are more than 14,000 scientific research plots in the vicinity of Toolik Field Station (TFS). The area around TFS has been chosen as the arctic site for the National Ecological Observatory Network, an upcoming program of ecological observation that is funded by National Science Foundation and is expected to last for 30 to 50 years. The RNA should be expanded to include most of the current research plots that are on BLM-managed land in the vicinity of the TFS. The boundary adjustment would add 30,500 acres to the RNA.

^aSize of adjusted ACEC

2.8.2. National Trails

The Iditarod National Historic Trail crosses the planning area, but little if any of the designated trail is located on BLM-managed lands. There is a current management plan for the trail and permitted activities on the trail are generally administered out of the BLM's Anchorage Field Office as they manage the vast majority of the trail. One comment noted that uses of the historic trail should continue to be managed within the guidelines of the current Comprehensive Trail Management Plan.

2.8.3. Wild and Scenic Rivers

2.8.3.1. Nominations for New Rivers

As part of the planning process, the BLM identifies all free-flowing rivers that cross BLM-managed lands and that have at least one "outstandingly remarkable value" (ORV) and therefore may have potential for addition to the National Wild and Scenic River System (BLM Manual 6400, 2012). Additionally the Wild Rivers lawsuit settlement agreement (8/30/1993) requires the BLM to review rivers in the Utility Corridor Planning Area for eligibility and suitability for inclusion in the National Wild and Scenic Rivers System. Rivers determined to be eligible will be identified in the Draft RMP/EIS and those determined suitable will be considered in at least one alternative to allow for analysis of impacts from designation. Actual designation requires action by Congress.

The BLM received approximately 28 comments on designation of wild and scenic rivers. These included comments in support of study and designation of new wild and scenic rivers and comments in opposition to any new study or designations. Those in opposition generally noted that there would already be enough wild and scenic rivers, that new designations contradict ANILCA, and that designation of rivers is unnecessary and would create too many restrictions on BLM-managed lands.

The following rivers were mentioned in comments as being potentially eligible and suitable for designation. Only a few of the comments identified outstandingly remarkable values for any of these rivers. The Melozitna River was identified for study by section 604 of ANILCA. A study report on the Melozitna was completed in 1982 by the National Park Service and found that the river was not qualified because it lacked any outstandingly remarkable values. The Alatna and John rivers within the Gates of the Arctic National Park are already designated as wild rivers.

Utility Corridor Subunit

- South Fork Koyukuk
- Jim River
- Atigun River
- Etivluk River
- Colville River
- Etivluk River
- Nigu River
- Alatna River

Middle Yukon Drainages Subunit

- Kanuti-Kilolitna River
- Tozitna River
- John River
- Melozitna River
- Hogatza River

- Chitanana River
- Dulbi River

Nulato Hills Subunit

- Kateel River
- Nulato River
- Tagagawik River
- Gisasa River
- Honhosa River

The BLM has to complete a baseline inventory of eligible rivers and assign a tentative classification (Wild, Scenic, or Recreational). An inventory of rivers in the planning area is underway to determine eligibility for inclusion in the Wild and Scenic River System. The rivers listed above will be considered in this inventory. When completed this inventory will be available to the public.

2.8.4. National Natural Landmarks

Three comments mentioned the National Natural Landmarks Program, which is administered by the National Park Service. These comments recommended that several of the research natural areas should be designated as national natural landmarks and also that the BLM should consider other locations in the planning area that may also be suitable for designation under this program.

Chapter 3. Draft Planning Criteria



West Fork Atigun River, Alaska

3.1. Preliminary Planning Criteria

During its initial internal planning sessions, the BLM Central Yukon Field Office staff developed preliminary planning criteria. Planning criteria are the constraints, standards, and guidelines that determine what the BLM will or will not consider during its planning process. They establish parameters and help focus analysis. They also help to define the scope of the process and to estimate the extent of data collection and analysis required.

Planning criteria are based on: standards from applicable laws and regulations; agency guidance; results of consultation and coordination with the public, tribes, and other federal, state, and local agencies; analysis of information pertinent to the planning area; and professional judgment. They ensure that the RMP will be tailored to the issues the BLM identified through public participation and are designed to avoid unnecessary data collection and analysis. The BLM scoping process also sought public input on planning criteria.

The June 14, 2013, Notice of Intent listed the following 18 planning criteria:

1. The primary purpose of the lands withdrawn by Public Land Order 5150 is the transportation of energy resources; therefore, the BLM will avoid proposing actions or activities with potential adverse impacts to existing and future energy transportation systems on these lands located within the corridor.
2. The BLM Central Yukon Field Office will encourage opportunities for public participation throughout the planning process.
3. The BLM will recognize and protect valid existing rights.
4. The BLM will consider subsistence uses and minimize adverse impacts in accordance with Section 810 of the ANILCA.
5. The BLM will work cooperatively with State and federal agencies, Native corporations, tribes, and municipal governments.
6. The BLM will consider plans and policies of adjacent conservation system units, land owners, and local governments.
7. The BLM will consider U.S. Department of the Interior guidance, Alaska Department of Fish and Game objectives, and Federal Subsistence Board requirements and mandates in decisions related to wildlife management.
8. The RMP will be consistent with the BLM's H-1601-1 Land Use Planning Handbook, Appendix C, Program-Specific and Resource-Specific Decision Guidance and applicable BLM manuals and handbooks.
9. The plan will be consistent with the standards and guidance set forth in the Federal Land Policy and Management Act, the National Environmental Policy Act, Council on Environmental Quality, Historic Preservation Act, Wild and Scenic Rivers Act, Migratory Bird Treaty Act, ANILCA, and other Federal laws, regulations, and policies as required.
10. The plan will be consistent with the BLM Alaska Land Health Standards.

11. The BLM will complete designations for off-highway vehicles for all BLM-managed lands within the planning area according to the regulations found in 43 CFR part 8342.
12. Within the Utility Corridor development nodes, the BLM will assess areas designated by BLM in the Utility Corridor RMP and Record of Decision (BLM 1991) for future development (i.e., visitor facilities, campgrounds, rest stops, etc.) regarding the location, size, boundaries, and appropriate uses, their long-range development, State or federal management, and effects on adjacent and nearby lands and their uses.
13. The plan will address public access needs.
14. The BLM will consider current and potentially new special designations, such as Areas of Critical Environmental Concern and research natural areas, using the criteria found in 43 CFR 1610.7–2 and 43 CFR part 8223.
15. Review and classification of waterways as eligible for inclusion in the National Wild and Scenic River System will be consistent with the guidance in BLM’s 8351 Manual — Wild and Scenic Rivers.
16. The BLM will incorporate environmental justice considerations in land use planning alternatives to adequately respond to environmental justice issues facing minority populations, low income communities, and tribes living near BLM-managed lands and using public land resources.
17. The plan will assess all BLM-managed lands in the planning area for wilderness characteristics using criteria established by BLM Manual 6310. The RMP will examine options for managing lands with wilderness characteristics and determine the most appropriate land use allocations for these lands. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; and, (3) the protection of wilderness characteristics as a priority over other uses.
18. The BLM will manage the Central Arctic Management Area Wilderness Study Area consistent with BLM Manual 6330 – Management of BLM Wilderness Study Areas, and ANILCA, until Congress acts on the wilderness recommendation.

3.2. Comments on Planning Criteria

Several public comments were related to planning criteria. For example, one comment recommended that the BLM formulate additional planning criteria related to road development. One comment supported planning criterion 18 regarding management of the CAMA WSA. Another comment noted that the inclusion of R.S. 2477 routes and 17(b) easements is required by planning criterion 3 because these are valid existing rights.

One internal suggestion was to expand on criterion 9 to discuss other federal laws or regulations that are not obvious and are potentially controversial (for example, laws and executive orders related to wetlands and water quality requirements).

Members of the public recommended the following new planning criteria:

- The BLM will consider non-road alternatives a priority over road developments to minimize adverse impacts to subsistence and wildlife habitat.
- All components of an individual alternative must be complementary (no internal inconsistencies within a single alternative).

The following edit to a planning criterion was suggested.

- 7. The BLM will consider U.S. Department of the Interior guidance, Alaska Department of Fish and Game and USFWS objectives, and Federal Subsistence Board requirements and mandates in decisions related to wildlife management.

Chapter 4. Data Summary-Data Gaps



Von Frank Mountain, Kuskokwim Mountain Range, Alaska

4.1. Introduction

As part of the RMP planning, evaluation, and data-collection process, the BLM has inventoried available information and has identified data needs as discussed in the following sections. Additionally, through the scoping process, the public and cooperating agencies identified sources of available data and areas where data was lacking.

The BLM will use both existing and new resource information to formulate resource goals, objectives, and management alternatives in the RMP. To facilitate this process, the BLM is compiling information and putting it into digital format for use in analysis and map production using geographic information systems. Because this information is imperative to quantify resources, update maps, and manipulate information during alternative formulation, this data compilation process must be completed before actual analysis can begin. The new data generated during the RMP process will address planning issues and will meet applicable established standards.

The BLM will:

- Compile data for various social and economic parameters as part of the Analysis of the Management Situation and through the Central Yukon Rapid Ecological Assessment. This data will be used to develop the Draft RMP/EIS.
- Develop mineral potential reports for both leasable and locatable minerals with input from the State of Alaska and the U.S. Geological Survey. The report will assess the mineral resource occurrence and development potential for the Central Yukon Planning Area.
- Conduct a wild and scenic river eligibility and suitability study and incorporate the results into the alternatives and analysis in the Draft RMP/EIS.
- Conduct a wilderness characteristics inventory and incorporate the results into the alternatives and analysis in the Draft RMP/EIS.
- Conduct a visual resource inventory and incorporate the results into the alternatives and analysis in the Draft RMP/EIS.
- Review existing ACECs and RNAs using criteria in BLM Manual 1613 Areas of Critical Environmental Concern and the regulations under 43 CFR 1610.7-2 and 43 CFR 8223. The results will be incorporated into the alternatives and analysis in the Draft RMP/EIS.
- Assess areas nominated for designation as ACECs using the same criteria. The results will be incorporated into the alternatives and analysis in the Draft RMP/EIS.
- Work with the University of Alaska to conduct the Central Yukon Rapid Ecological Assessment. The results will be incorporated into the alternatives and analysis in the Draft RMP/EIS to the extent the data are available at the appropriate time during the planning schedule.

4.2. Relevant Data Provided or Identified During Scoping

Several commenters recommended relevant data sources during scoping (Appendix A).

The State of Alaska identified various State departments and agencies that could provide relevant data. Additionally it provided references to several petroleum assessments, areas of elevated oil and gas potential, known mineral occurrences, and resources for management on State lands. The State identified locations of State databases for social and economic data, including subsistence data collected by Alaska Department of Fish and Game. and provided a list of references and useful resources. The State of Alaska is a cooperating agency, and State agencies and departments

will provide additional data and technical review during development of the mineral potential reports and the Draft RMP/EIS.

The USFWS provided a list of references for reports and data sources for mining reclamation, fisheries, sensitive plants, and Dall sheep. The USFWS is a cooperating agency and will provide additional data and technical review during development of the Draft RMP/EIS.

The community of Wiseman noted that there are new subsistence studies for Wiseman due to gas line proposals. The Western Arctic Caribou Herd Working Group submitted maps of caribou habitat within the planning area. The Alaska Wilderness League provided references for reports on climate change, health impact assessments, the State's comprehensive wildlife strategy, impact analysis, and the Critical Habitat Assessment Tool.

4.3. Data Gaps Identified During Scoping

Potential data gaps identified by the public and cooperating agencies during scoping include the following:

- Incomplete subsistence data (Subsistence use areas, seasonality of use, species harvested, and methods of access are available for only some communities, and available data are not always consistent between communities)
- Limited economic and social data, inconsistent between communities
- Unknown impacts of roads and highways on caribou migration patterns
- Incomplete trails inventory
- Limited climate data and uncertainty about future changes to the climate.
- Incomplete knowledge of the extent of anadromy.
- Limited data on mineral potential due to limited exploration in the planning area.
- Lack of definitive delineation of petroleum resources in the planning area.

Chapter 5. Future Steps in the Planning Process



Winter scene of Hughes, Alaska

5.1. Future Steps and Public Participation

The next phase of the BLM's planning process is to complete the Analysis of the Management Situation (AMS), which will describe the existing condition of the planning area, existing data, and existing management decisions from the existing plans. Information from the AMS will help to craft Chapter 3 of the Draft RMP/EIS, Affected Environment.

Once the AMS is complete, the BLM will then develop draft management alternatives based on the issues presented in Chapter 2 of this scoping report. These alternatives will be incorporated into Chapter 2 of the Draft RMP/EIS, Alternatives. The alternatives will address planning issues identified during scoping, will meet the purpose and need of the project, and address goals and objectives to be developed by the BLM's interdisciplinary RMP team. In compliance with the National Environmental Policy Act, CEQ regulations, and BLM planning regulations and guidance, the alternatives will be reasonable and capable of implementation. The BLM will complete a detailed analysis of the alternatives and identify the Agency's preferred alternative. The preferred alternative is often made up of a combination of management option components from various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the issues.

The analysis of the alternatives will be documented in Chapter 4 of the Draft RMP/EIS, Environmental Consequences. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the Draft RMP/EIS is published. The draft document will be widely distributed to tribes, Native corporations, elected officials, regulatory agencies, and members of the public, and it will be available on the project website (<http://www.blm.gov/ak/cyrmp>). 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 throughout the project area during the comment period.

At the conclusion of the public comment period, the BLM will revise the Draft RMP/EIS and publish the Proposed RMP/Final EIS. A *Federal Register* notice will announce the availability of the proposed document and a 30-day public protest period will follow regarding the proposed planning level decisions (43 CFR Part 1610.5.2). If significant changes result from the protests, the BLM will publish a notice in the *Federal Register* requesting comments on the changes. Concurrent with the protest period, the Governor of Alaska will review the document for consistency with approved State and local plans, policies, and programs.

At the conclusion of the public protest period and the Governors' consistency review, the BLM will resolve all protests and any inconsistencies, and the Approved RMP and Record of Decision will be published. The availability of these documents will be announced in the *Federal Register*. Any implementation-level decisions in the RMP are not subject to the protest process, but instead are subject to administrative remedies set forth in regulations applicable to the specific resource management program. These remedies generally take the form of appeals to the Office of Hearings and Appeals within 30 days of the effective date of the record of decision or in accordance with the provisions of 43 CFR 4.4.

The BLM will post all publications (including this scoping report, Analysis of the Management Situation, newsletters, the Draft RMP/EIS, the Proposed RMP/Final EIS, and the Approved RMP/Record of Decision) on the RMP website (<http://www.blm.gov/ak/cyrmp>). In addition, all pertinent dates for solicitation of public comments will be on the website.

5.2. Contact Information

The BLM encourages public participation throughout the planning process for the RMP. Some ways to participate include:

- Review the progress of the RMP on the website, which will be updated with information, documents, and announcements throughout the duration of the RMP preparation; and
- Request to be added to or to remain on the Central Yukon RMP mailing list to receive future mailings and information.

Anyone wishing to be added to or deleted from the mailing list, wishing to change their contact information, or requesting further information may email a request to CentralYukon@blm.gov or contact Jeanie Cole, RMP Team Lead. Please provide your name, mailing address, and email address, as well as the preferred method to receive information (email, regular mail, or both).

Central Yukon RMP Contacts:

Shelly Jacobson: Central Yukon Field Manager
Email: s05jacobso@blm.gov
(907) 474-2356

Jeanie Cole: RMP Team Lead
Email: j05cole@blm.gov
(907) 474-2340

Mailing Address

BLM, Fairbanks District Office
1150 University Avenue, Fairbanks, Alaska 99509

Project Website and Project Email

Project website: <http://www.blm.gov/ak/cyrmp>
Project email: CentralYukon@blm.gov

5.3. Cooperating Agencies

At the date of this report, formal cooperating agencies for the Central Yukon RMP include:

- U.S. Department of the Interior, Fish and Wildlife Service
- Alaska Department of Natural Resources, representing the State of Alaska

Appendix A. Public Comments

The comments listed in this appendix are summarized, paraphrased comments of all scoping comments received on the Central Yukon RMP. Similar comments were combined into a single comment. For example, numerous individuals recommended that the Toolik Research Natural Area (RNA) be expanded as recommended by the Toolik Management Team. This comment is listed only once in this appendix, even though it was submitted multiple times.

Comments are listed under the issue category that they were coded to as the comments were parsed out of comment letters. There is considerable overlap between issue categories.

The full list of all public comments is available from the Fairbanks District Office at 1150 University Avenue, Fairbanks, Alaska.

A.1. Access Comments

The elimination of public access to public lands through private property has contributed to the loss of motorized access and motorized recreation opportunities. The BLM should acquire private land, easements, or rights-of-way to provide access to public land that is blocked to public access. If there is a land exchange, a public access easement should be retained.
Transportation management and access decisions in the plan could lead to increased access to remote National Wildlife refuge lands, affecting subsistence resources and increasing habitat degradation.
The true costs of proposed roads, such as the Ambler and Umiat roads should be considered in an EIS prior to permit approval. Projects such as these have many socioeconomic impacts.
The RMP should address the issue of use of the Bettles winter road by the general public to access Bettles and lands beyond. If a permit does not already exist, recommend providing an easement to avoid violating AS 19.40.210.
The right-of-way for the winter road to Bettles should be retained by the BLM, not transferred to State ownership. This right-of-way should remain open to the public, as it is now.
All existing easements and rights-of-way should be recognized, identified, and mapped for this planning effort.
The RMP needs to consider the impacts of and provide mitigation for increased access requests to adjacent refuge and park lands that may result from decisions in the RMP.
Comments asked for clarification and the status of the proposed Ambler Road project. The RMP should evaluate the impacts of this project to the communities in the planning area. Residents in the planning area are concerned about the impacts that this road could have to water resources, spawning areas, fish and wildlife, and the impacts of future mining developments that could occur in traditional land use areas should the road be constructed.
Heavy mining activity on State lands in the Chandalar mining district is likely to impact the Arctic NWR, upstream, and the Yukon Flats NWR downstream. The BLM should exercise caution and consider cumulative effects when allowing access to this area.
How does the proposed road to Umiat relate to the RMP? This road could have significant impacts on the way the caribou herd migrates near Anaktuvuk Pass.
The RMP must specifically address both ANILCA Title XI Transportation and Utility Systems and section 1323(b), which guarantees access to inholdings, including but not limited to access from the Dalton Highway Corridor. Title XI applies to conservation system units including the Iditarod National Historic Trail. RMP decisions such as right-of-way exclusion or avoidance areas cannot preclude the Title XI process.

The Upper Nigu River is not far from Anaktuvuk Pass. The community does not want the State to take over this area – especially the area south of Umiat.
The Dalton Highway case study is relevant to the RMP analysis because it shows how an initially restricted industrial access highway became open to unrestricted public travel. It was opened to public access despite initial commitments for it to remain closed. This issue should be addressed for Umiat Road, Ambler Road, and other potential industrial road proposals in the planning area with respect to potential effects of roads and associated development.
If open to the public, the Ambler Road would allow access to waterways by snowmachines, jetboats, and other recreational or sport uses that could have devastating impacts on nesting and foraging grounds for raptors, waterfowl, shorebirds, and any other species (bird, mammal or otherwise) concentrated along river corridors. Public access could bring detrimental effects from increased visitor numbers that can disrupt and compete with subsistence uses and degrade the quality of those resources and the environment supporting the resources. Additionally the road would be located near spawning areas for sheefish, chum and king salmon.
The RMP must take into consideration the "need for access for surface transportation from the Ambler Mining District to the Alaska Pipeline Haul Road," as recognized in ANILCA Section 201(4)(b), and not impose special designations or other management prescriptions in the Utility Corridor, which would preclude the siting and authorization of a road corridor.
Public access has and will continue to be an issue of concern across most public lands in Alaska. All current easements and potential points and routes of access are important for access to public lands and resources, and beyond concentrated areas of current transportation corridors. Such routes should be reserved and developed to the maximum extent practicable. The RMP should consider whether additional access opportunities from the Dalton Highway should be developed and provide for new access corridors across BLM-managed land. Access is needed to allow for exploration and development of Alaska's natural resources. The planning area encompasses a extremely large and diverse geographic area with oil, gas, mineral, coal, and geothermal resources, some with high potential. Planning for BLM-managed lands located near or adjacent to mineralized areas should take into account the need for flexibility in planning for access and supporting infrastructure based on land ownership and physical characteristics of the terrain. Trails for access to resources should be maintained and other resource users should have access along these trails.
Some comments were generally opposed to any new access to the planning area. Specific areas where comments indicated that new access was not desirable included the Ray Mountains and Tozitna River.
Comments expressed opposition to two proposed projects (Doyon's proposal for a winter road in the vicinity of Stevens Village for oil and gas exploration and interest from some of the private property owners in the Ray River/Big Salt River/Ray Mountain areas) because it goes right into the Kanuti Flats, Big Ray, and Big Salt Rivers.
The Indian Mountain trail near Hughes is no longer open. It is overgrown.

A.2. Air Resources

The Draft RMP/EIS should provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards, and criteria pollutant non-attainment areas in the planning area. The analysis should estimate emissions of criteria pollutants and discuss the time frame for release of these emissions over the lifespan of the RMP. Also, the document should include analyses of the potential impacts to air quality (including cumulative and indirect impacts) from RMP projects, especially those involving construction activities. The Draft RMP/EIS should specify emission sources and quantify these emissions. Such an evaluation is necessary to assure compliance with

State and federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.
Impacts to air quality from oil and gas activities should be analyzed per the June 2011 Interagency Memorandum of Understanding for Air Quality Analysis and Mitigation for Federal Oil and Gas Decisions.
The RMP should quantify and disclose anticipated greenhouse gas emissions from proposed planning decisions and discuss mitigation measures to reduce such emissions.

A.3. Climate Change

The RMP should incorporate buffer zones around identified critical habitat to increase options for species under various climate change scenarios.
The BLM should incorporate funding and plan for additional research on the impacts of climate change on water resources given the significant number of watershed headwaters on BLM-managed lands in the planning area.
The boreal forest ecosystem health benefits extend well beyond the Arctic regions. The boreal forest is often referred to as the “lungs of the planet,” and has a daily rhythm of taking in carbon dioxide and expelling oxygen. In addition to generating oxygen, this process makes the boreal forest a store house for carbon dioxide. Its trees and peat lands comprise one of the world’s largest carbon reservoirs as it takes in more carbon dioxide than it releases.
The RMP needs to consider which habitats or areas are most likely to be impacted by climate change and adopt an adaptive management scheme to minimize the effects.
A large part of the planning area supports boreal forest ecosystem. Potential effects on climate change on the boreal forest include: decreases in moisture sufficient for forest growth; continued or expanded tree mortality from insect outbreaks; changes in fire intensity and frequency; and changes in habitat due to permafrost thawing (Juday et al. 1998).
While we are not certain what the precise impacts of climate change will be on Yukon River salmon, it is clear that warming waters and changing ecosystems is, and will have a profound impact on Yukon River salmon. These impacts, as well as the uncertainty, should be considered in the EIS and the RMP should support a precautionary approach to management actions.
The BLM needs to consider the impact of climate change on subsistence resources and practices. Changes in habitat within and beyond BLM-managed lands are predicted to stress wildlife, waterfowl and fish populations that serve subsistence resources. Some populations may increase in abundance within the planning area, while others may alter their migration and become unavailable.
Climate change is being given too much weight. This focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time. There are many in the scientific community that support this position. The climate has always been changing. The planning rule should not create impacts on the human environment because it “presumes” that the climate is changing any more or less than it always has. The RMP must be based on extensive long-term credible scientific study. The quality of people’s lives cannot be compromised by a ghost issue without adequate basis. Extensive long-term credible scientific conclusions on climate change do not exist at this time and, therefore, it would be unreasonable to make any assumptions about climate change and use those assumptions to impose any impacts on the human environment.
The planning questions that the BLM developed to describe the climate change issue seem inconsistent with other DOI agencies hands-off management strategies in regards to climate change, and imply that the BLM intends to attempt to maintain the current habitats as is, even if they are not compatible with the changing climate. For example, by referencing “temperature increases of nearly 2.1 degrees F since 1900, the issue statement implies that temperatures in 1900 should be considered the norm, or appropriate benchmarks. These statements also imply that change is necessarily negative.

In addition to the required analysis of impacts, including cumulative impacts, it is important that the BLM fully consider mitigation of the RMP's contributions to climate change and adaptation in the plan alternatives to inevitable changes on the landscape due to climate change. A climate adaptation plan should be a high priority.
Climate change adaptation plans should be a priority in the RMP due to the changes we are seeing including erosion of villages. This climate change adaptation plan should account for the massive seasonal changes that Alaska is experiencing.
The BLM must work closely with local and state experts to prevent and minimize impacts of climate change to habitat and wildlife. The RMP must prioritize existing uses of the region over new incompatible uses, such as oil and gas or mineral development.
The BLM should monitor daily and seasonal weather patterns, including but not limited to max/min/mean daily temperatures, growing degree days and frost-free season length as important parameters for understanding changes in forest ecology that need to be incorporated into management decisions.
The BLM must incorporate the best available science, using the best available methods, in addressing climate change impacts on the ecosystems and inhabitants of the planning area, as required by law. If there is not sufficient expertise within the agency, the BLM should seek outside assistance in order to prepare a reasonable, comprehensive assessment of climate change that will serve the purpose of conservation and sustainable management of the resources.
Climate change is one of the greatest threats facing national landscape conservation lands and Alaska's rural communities today. The BLM should make this issue a priority and incorporate it into all planning and management strategies. There is a clear scientific consensus on the impacts from climate, and many changes will definitely take place within the planning area.
The BLM should incorporate the following into the RMP goals and objectives, not as a separate section on climate change: training on climate change and variability for all resource managers; consideration of climate change and variability as a component of long-range management plans and strategies, as well as prioritizing adaptive management; implement monitoring and assessment programs for impacts to habitats expected to be the most affected by climate change; educate the public about climate change and its effects on Alaska public lands and resources; and establish and maintain migration corridors that allow species movement among islands of suitable habitat as vegetation shifts.
There is an extensive body of literature regarding the quantitative analysis of uncertainty and variability in environmental policy and decision making (Frey 1992 and onward, Morgan and Henrion 1990). Within the scientific literature there are examples of a variety of statistical methods that can be used to address uncertainty that the BLM can use in its analysis of climate change and within the context of cumulative effects should BLM's scientists feel that the uncertainty in the scientific literature surrounding climate change is too great (Webster 2002, Roe and Baker 2007).
<p>The NEPA analysis for the RMP should incorporate existing climate change planning documents, including the Norton Bay Climate Change Adaptation Plan which has the following goals:</p> <ul style="list-style-type: none"> ● Obtain funding for emergency preparedness and/or relocation of native villages in the Planning Area Watershed most critically impacted by coastal erosion and flooding; ● Mitigate and/or adapt to impact of rising water temperature/stream bank erosion on aquatic habitat; ● Increase safe access to subsistence resources watershed; ● Protect subsistence resources in 100 percent of watershed ● Increase education and outreach opportunities for native villagers to learn about climate change impacts with a focus on local issues and adaptation strategies; ● Set precedent in Norton Sound Region for data collection, watershed assessment and climate change adaptation planning; and ● Improve economic conditions in Planning Area area native village communities.

Other BLM plans in Alaska have failed to address climate change in a quantitative and comprehensive manner; using the unfounded argument that there is too much uncertainty. Uncertainty is prevalent in all actions and impacts that the BLM considers when planning, and cannot be used as an excuse for failing to develop a range of possible impacts and assessing what the biological and value-based thresholds are for the affected resources, ecosystem and human communities (CEQ 1997, IPCC 2007, and CCSP 2008).

The BLM must disclose the assumptions that are made about climate change impacts during the planning process and the ways in which it will be factored into the RMP.

A.4. Cultural Resources

Kobuk Lake is an important cultural site because the native people had battles there.

There are large quantities of fossils on the road to Hog Landing.

The RMP should consider the following goals for cultural resources: Work closely and cooperatively with the local villages and other stake-holders. A strong relationship should be developed with two way dialogues and open and honest communication of goals and information; Designate the site with the strongest protections for the historic resources; Have an ongoing relationship with the local community to have flexible management of the village site.

The BLM should survey all known or discoverable cultural and historic sites, or those adjacent sites that may be adversely affected by decisions in the RMP with an emphasis on determining those sites or areas most vulnerable to impact.

The BLM should develop a Cultural Resource Management Plan that coordinates with the objectives of the RMP and provides an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties. The RMP should establish a time line for completing the Cultural Resources Management Plan, and prioritize areas to be inventoried for cultural resources.

The RMP should provide enduring protections for the Mesa Site. The site should be retained in federal management and be designated as an area of critical archeological significance. There are also many other important traditional land use and cultural sites in this same region, and protecting them from industrial activities is very important.

The BLM should adopt specific management actions in the RMP to protect, conserve, and where appropriate restore cultural resources such as: stabilization, fencing, signing, closures, or interpretative development. Additionally, the BLM should adopt measures to protect resources from collectors, thieves, and vandals.

The BLM should consult with the local tribal government to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance and those that would qualify for protections under the National Historic Preservation Act, Archaeological Resources Protection Act, or other appropriate laws. Identified areas should be preserved to protect the significant cultural resources 'for appropriate uses by present and future generations' as required by BLM Land Use Handbook 1601-1, Appendix C.

We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. Western culture and heritage has been characterized by opportunities to work with the land and preservation of all remnants of this culture and heritage is important. Current management practices are not adequately protecting western culture and heritage including the opportunity to work with the land.

Travel across tundra can damage cultural resources. For example, there are burial areas and religious crosses northwest of Anaktuvuk Pass that people need to avoid damaging (without being told their precise location).

Melozi Hot Springs might be a historic site.

The tourists seem to really like Sukakpak Mountain. It is an important area with special significance to local people. There are a lot of stories about that.

When they did the archeological studies on the Galbraith corridor for the proposed road to Umiat, there were a lot of archeological sites found like fire pits and sites. Elders said they used to walk from Anaktuvuk Pass to Toolik Lake and do a lot of stuff at Toolik Lake and even the Galbraith areas and the Nigu area.
The BLM should recognize traditional land use areas in the RMP. There are areas that are culturally significant, special places to the Athabascan. Those places and uses should be recognized to avoid impacts.
The RMP needs to describe potential impacts to cultural resources associated with future land use.
A commenter described the rich historic and prehistoric resources in the Takotna and Hughes areas, including the discovery of human remains and stone tools about 10,000 years old. Also migration of Athabascan people through the area.

A.5. Data

This section includes data sources that the public recommended the BLM consult during development of the Draft RMP/EIS.

A video produced by Carl Adams presents many of the significant issues and concerns that are frequently expressed by members of our club and other motorized recreationists in the community. http://www.youtube.com/watch?v=0kUHLMi97dg&feature=g-userlik&context=G23216abUCGXQY-bcTJ33bB0U1oCKl_9bcFlhATY2tUW6mr0rdyBQc
Central North Slope Alaska Petroleum Assessment: In 2005, the USGS published an oil and gas assessment of undiscovered oil and gas resources of the central Alaska North Slope and adjacent offshore areas under State ownership (Bird et al. 2005). Much of the current North Slope petroleum production and associated infrastructure are located within the assessed area.
Source Rock Petroleum Assessment: The USGS assessed three source rock units on the North Slope for undiscovered, technically recoverable oil and gas (Houseknecht, et al., 2012.) These are the Triassic Shublik Formation, the lower part of the Jurassic Lower Cretaceous Kingak Shale, and the Cretaceous pebble shale unit and Hue Shale, together called the Brookian Shale unit. The estimated locations of these source rock units extend across most of the proposed North Slope Subunit of the Central Yukon Planning Area (Houseknecht et al. 2012b), and the vast majority of the assessed source rock resource volumes are expected to underlie State and Native lands of the central North Slope.
The Western Arctic Caribou Herd (WACH), the Teshekpuk Caribou Herd, the Central Arctic Caribou Herd and several smaller local herds all use habitat within the planning area (submitted figure 1). The planning area overlaps with the WACH's summer, winter, migration and peripheral ranges (Figure 2). The Central Yukon RMP will cover many topics and activities that affect the caribou herd, seasonal ranges and habitats used by the herd, and the people who use the herd.
Consider and incorporate strategies from the Preliminary Review of Adaptation Options for Climate-Sensitive Ecosystems (CCSP 2008) for discussion and methods that can and should be incorporated into the management plan in order to promote ecosystem resiliency. Further recommendations include: 1) Climate Change and Water Intergovernmental Panel on Climate Change (IPCC) Technical Paper VI (IPCC 2008); 2) Indigenous and Traditional Peoples and Climate Change Issues Paper (Macchi 2008).
The U.S. Fish and Wildlife Service's Alaska Fisheries Data Series contains compilations of fish inventories and surveys for many of the planning area's waterways and can be found at http://www.fws.gov/alaska/fisheries/fish/reports.htm .
The U.S. Fish and Wildlife Service recommends Report #2012-4 (Brown et al. 2012) for a summary of recent information on whitefish in the Yukon watersheds. Especially pertinent topics for consideration for whitefish include: spawning areas (p. 18); potential threats (p. 39); Yukon River Main-Stem Habitat Region (p. 66); Innoko River Habitat Region (p. 89); Koyukuk River Habitat Region (p. 100); Nowitna River Habitat Region (p. 111); Tanana River Habitat Region (p. 121); Upper Yukon River Habitat Region (p. 144); and research needs (p. 216).

The U.S. Fish and Wildlife Service recommends Fisheries Report # 2011-12 (Glesne et al. 2011) for a recent description of fish resources in Interior Alaska's National Wildlife Refuges.
The U.S. Fish and Wildlife Service recommends several reports on the Selawik River sheefish and whitefish including Brown 2013, Hander et al. 2008, Brown 2004, Underwood 2000 .
The Gisasa River provides important spawning and rearing habitat for chinook and chum salmon. Further, this river contains significant numbers of spawning adults for both species. Based on the Gisasa River weir and aerial survey data (http://sf.adfg.state.ak.us/CommFishR3/Website/AYKDBMSWebsite/DataSelection.aspx), this river is one of the main producers of Chinook and chum salmon in the Koyukuk River drainage. Mean Chinook escapements were 2,340 and median chum escapements were 36,398 as counted from the weir from 1995-2011 (Carlson 2012).
The Kateel River watershed provides important spawning and rearing habitat for adult Chinook and chum salmon and can have large numbers of returning adults. In 2002, weir operators on the Kateel River counted 73 Chinook and 2,853 chum salmon (VanHatten 2005). Aerial survey data can be found here: http://sf.adfg.state.ak.us/CommFishR3/Website/AYKDBMSWebsite/DataSelection.aspx
Dakli and Wheeler Creeks provide important spawning and rearing habitat for chum salmon and have large numbers of returning adults. The only information available on the creek is aerial survey data, but the data shows the creeks are a major producer of chum salmon in the Koyukuk River drainage. Aerial survey data can be found at: http://sf.adfg.state.ak.us/CommFishR3/Website/AYKDBMSWebsite/DataSelection.aspx
The Sulukna River provides important spawning and rearing habitat for sheefish. It is one of the six known spawning areas for sheefish in the Yukon River Drainage (Brown et al. 2012). Over 2,000 spawning adults have been documented migrating from the spawning locations during the fall of 2007 and 2008 (Esse 2011).
The Titna, Telsitna, Sethkokna Rivers provide spawning and rearing habitat for Chinook salmon in the Nowitna Drainage (Eiler et al. 2004). These tributaries are some of the few Chinook salmon producers in the drainage. Given current statewide Chinook salmon returns, all known spawning location are critical for the persistence of this species.
Information on health impact assessment is available through: Health Impact Project at http://www.healthimpactproject.org/ ; Habitat Health Impact Consulting: http://www.habitatcorp.com/ ; State of Alaska Epidemiology website: http://www.epi.alaska.gov/hia/
NPR-A Petroleum Assessments: In the most recent petroleum assessments for undiscovered, technically recoverable oil in the NPR-A, immediately to the west of the planning area's North Slope Subunit, oil estimates ranged from 336 to 1,707 million barrels of oil (MMBO), with a mean of 895 MMBO (Houseknecht et al. 2010; Attanasi and Freeman, 2011). Comparably, the NPR-A natural gas estimates ranged from 3.1 to 77.5 trillion cubic feet (TCF), with a mean of 52.8 TCF for non-associated gas (Houseknecht et al. 2010; Attanasi and Freeman 2011).
Arctic National Wildlife Refuge Coastal Plain Petroleum Resources: 1982 vintage 2-D seismic data; and estimate of non-associated natural gas deposits. USGS (U.S. Geological Survey) 1998, The Oil and Gas Resource Potential of the Arctic National Wildlife Refuge 1002 Area, Alaska: U.S. Geological Survey Open File Report 98-34.
USGS resource assessment of the Kandik area (Johnsson and Howell 1996) assigned a 42 percent probability that it contained at least one accumulation of technically recoverable oil or gas and estimated the undiscovered, technically recoverable resource endowment at about 0-300 million barrels of oil and less than 200 billion cubic feet of gas.
Resources for management on State lands include: the fact sheet "Generally Allowed Uses on State Land" (August 2011) and "Select State for Managing State Land/Water and Related Public Activities involving Fish and Wildlife Resources" Version 8, updated December 13, 2010
Alaska DNR has identified specific basins and areas directly to the east of the proposed Central Yukon/Fairbanks subunit where oil and gas have elevated potential. Resource potential exists in the Upper Black River, Steese, White Mountain, and Fortymile areas. The Kandik and Nation River sub-basins have garnered attention from the oil and gas industry in the past, with exploration programs on Doyon Native Corporation lands. The greater Yukon Flats basin, located just to the east of the planning area, can be divided into several discrete areas where the sedimentary basin fill reaches thicknesses that may be capable of hosting petroleum hydrocarbon systems.

ADFG has conducted subsistence research in a number of communities, the results of which are documented in the ADFG Division of Subsistence's Technical Paper series and the Community Subsistence Information System (http://www.subsistence.adfg.state.ak.us/). ADFG conducted subsistence harvest surveys documenting household harvests of non-salmonid fish and large and small land mammals in Alatna, Allakaket, Evansville, and Wiseman in 2011 and in Galena, Nulato, and Ruby in 2010. ADFG documented fish harvests in 2002 in Koyukuk. Older, but still relevant subsistence harvest information also is available in the Community Subsistence Information System and Technical Paper series for many of the communities located in the planning area.
Review the Alaska Department of Fish and Game's Comprehensive Wildlife Conservation Strategy, "Our Wealth Maintained: A Strategy for Conserving Alaska's Diverse Wildlife and Fish Resources" (Attachment B). This document is a resource for prioritizing habitat and wildlife species, and has information which will help better collaborate with ongoing State-based efforts.
<p>The planning area includes ADFG Game Management Units (GMU) 19, 20, 21, 22, 23, 24, 25 and 26. Information resources developed by the ADFG may prove useful in analyzing fish and wildlife habitat, distribution, and use within the planning area. Documents that may be of assistance include:</p> <ul style="list-style-type: none"> • Wildlife Action Plan: http://www.adfg.alaska.gov/index.cfm?adfg=species.wapabout • Alaska's Wildlife and Habitat, ADFG, Jan. 1973. • Alaska Habitat Management Guide Series • Anadromous Waters Catalog: http://www.sf.adfg.state.ak.us/SARR/FishDistrib/anadcat.cfm
There are new subsistence studies for the Wiseman area due to the gas line. This is valuable data about the area that can be incorporated into the RMP.
The USFWS has point data for stick nests (possible nesting sites of peregrine falcons and raptors) that may be valuable to the BLM.
The BLM should refer to the Dalton Highway Management Plan (1993) which refers to the rare earth minerals the State is interested in, in the Gray Mountains by accessing them via an ice road at Yukon Crossing.

A.6. Economics

The BLM should provide a socioeconomic analysis and ensure a full accounting of the costs and benefits of each of the alternatives. The values of protected lands and the hidden costs associated with development should be incorporated into the economic analysis.
The BLM should consult and integrate the planning documents of local governments. The Department of Community and Economic Development maintains another valuable source of detailed community information using an on-line database at: http://commerce.alaska.gov/cra/DCRAExternal/ . This site also contains detailed community profile maps that may prove useful in reviewing land status and existing infrastructure.
Are there decisions that the BLM can make in the RMP that will advance local economic and social goals? Yes, relax mining permit rules to allow subsistence gold mining for small Mom and Pop, small crew mechanized subsistence gold mines under 5 acres. Doing this is desirable economically and is the traditional social condition, and the BLM should allow this, not deter it. The BLM role as land manager should acknowledge subsistence gold mining, less than 5 acres by local Mom and Pop, family and small crew, mechanized gold mining is beneficial to the local economy. The BLM now is shutting down miners and killing the local economy. Relax the rules and allow the miners to scratch out a living subsistence gold mining.
The plan needs to reflect the economic contributions of mining on the economy of Alaska with special attention to rural Alaska. The economic consequences of special land use designations and restrictions such as mineral closures, Areas of Critical Environmental Concern, Wild and Scenic Rivers, etc. must be considered within this plan. The possible economic contributions of improved access should also be considered.

<p>a pro-recreation alternative must be developed for the Central Yukon Draft RMP/EIS. The Central Yukon area could become as successful as the Marysvale, Utah area (http://www.marysvale.org/) which is based on the Paiute trail and the Caliente and Pioche, Nevada area which is based on the Chief Mountain and Silver State Trail systems (http://nvtrailmaps.com/trail.php?trail=708). These trail systems bring in thousands of motorized recreationists who buy lodging, meals, parts, fuel, and goods in adjacent towns.</p>
<p>The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist on nearby public lands must be adequately evaluated and considered in the Draft RMP/EIS. These impacts include: the complete loss of recreational opportunities; the cost of having to travel farther and farther in search of fewer and fewer motorized recreational opportunities in times of increasing travel costs; and the significant cumulative negative effect of all travel management decisions in the region.</p>
<p>The Draft RMP/EIS should include an adequate benefit-cost analysis of non-motorized versus motorized trail use. This analysis should include the annual cost of the non-motorized trails per the actual and documented number of non-motorized trail users. The analysis should also compare the annual benefit-cost per non-motorized user versus the annual benefit-cost per motorized user if the trails and funding were used as multiple use/motorized trails. The benefit-cost analysis should also recognize the significant economic benefit associated with motorized recreation. Motorized economic benefit far exceeds the economic benefit of non-motorized recreation because there are more motorized recreationists and they have a considerable investment in their recreation. Economic benefits to the local economy associated with motorized recreation include sale of OHVs, parts and service; sale of tow vehicles, parts and service; sale of camping units, parts and service; fuel; meals; motels, etc.</p>
<p>The Draft RMP/EIS should evaluate non-market values provided by lands with wilderness characteristics, per BLM's commitment set out in draft IM 2010-061.</p>
<p>The full economic and social facts and impacts are not being adequately considered by the federal land management agencies. Adequate evaluation of the economic and social impacts of this proposed action must be considered in the analysis and decision making.</p>
<p>The BLM should analyze the benefits to local communities from management which ensures that the area's habitat and subsistence values are protected, such as through special administrative and Congressional designations, and that the important economic role that protected public lands play in the local subsistence or cash economy is continued or enhanced.</p>
<p>While the subsistence sector is essential to the rural economy, so is the cash sector. The economy of the tribes within the watershed is primarily subsistence with a cash overlay meaning that the major portion of food and other necessities and therefore "income", is from subsistence hunting, fishing and wild plant and berry gathering. However, the communities are also dependent on the cash economy to pay bills and to buy food, oil and gas. The most successful families in the rural economy combine employment income with subsistence production. Income from jobs is invested in equipment to harvest wild foods. Commonly, the most highly productive subsistence harvesters are from households with the largest monetary incomes. The socioeconomic system in rural areas is most properly understood to be a mixed, subsistence-cash system in which subsistence and cash sectors are interdependent and mutually supportive</p>
<p>Because a higher percentage of their food supply comes from this subsistence lifestyle, the Villages are, disproportionately, impacted by the effects of climate change which is exacerbated by mining and other industrial development activities. In addition, income from conventional employment is, usually, invested in equipment to harvest wild foods and, therefore, commonly, the most highly productive subsistence harvesters are from households with the largest monetary incomes, so low household income and poverty will impact subsistence uses as well.</p>
<p>The value of subsistence goes beyond economics: 'these resources are also critical to Native Alaskans' cultural and social identity. A traditional and customary use, and subsistence lifestyle requires an understanding of the intricate web that links humans, animals, and the environment. Alaska Natives rely on the subsistence lifestyle, but external forces are threatening this way of life. Foreign values such as wage employment, the accumulation of wealth, and the exploitation of natural resources compete with Native values.'</p>

The economic welfare of the village communities is substantially impacted by changing weather patterns, which as with elsewhere, are dependent on the cash economy to pay bills and to buy food, oil and gas and other necessities. Employment and household income, however, are, generally, lower than the rest of the country on average while poverty levels are considered to be higher. Common sources of income include commercial fishing, trapping, or fish processing, public sector jobs from government grants, such as schools, and dividend payments from Alaska Native corporations.
Central Yukon area is struggling with the existing economic conditions confirming that an economy based largely on wilderness recreation will be limited. Further decisions that force the economy to rely solely on wilderness and non-motorized recreation will move [the planning area] in a direction that will result in further economic hardship.
The subsistence way of life in many Alaska Native villages is augmented with activities supporting cash economy transactions. Alaska Native villages, in partnership with Alaska Native corporations and other business interests, are considering a variety of economic development opportunities. Most Alaska Native villages have decided for themselves that large-scale hard rock mining is not the direction they would like to go and are, primarily, concerned with the long-term sustainability of their communities.
Impacts to commercial fisheries should be analyzed not on the basis of economic value alone, but on the role of these fisheries as sources of employment in the affected communities.
The area under consideration in this RMP surrounds many rural communities. Resource development in the area could provide economic benefits to the region where well-paying jobs are scarce, as well as improved or added infrastructure and access to areas for multiple use.

A.7. Wildfire Management and Ecology

The BLM should incorporate ways to educate the public on the respiratory health consequences of increased fires and monitor and mitigate impacts to human health into the Central Yukon Resource Management Plan.
Climate change models indicate that boreal forests are in grave danger. It is important to identify significant ecological habitat within the planning area for protection, particularly within river corridors, for fire-suppression management.
The BLM must fully examine issues around the Umiat Road and the possible increased need for forest fire response due to greater numbers of people in the region.
The Draft RMP should include provisions to evaluate the effects of fire on caribou habitat and identify a suite of fire management strategies that the BLM and adjacent landowners can adopt. For example: 1) Ensuring the use of fire-retardants do not result in harmful effects on the ecosystem, as these effects can concentrate in the caribou through grazing and drinking affected water; 2) Manage fire for various-aged lichen stands in caribou winter range, recognizing the importance of old growth lichen ranges; 3) Regularly review and evaluate agency fire management plans and fire management options to ensure they reflect the best interest of the Western Arctic Caribou Herd; and 4) Work at a landscape level with other land managers to allow caribou the ability to shift their seasonal ranges in response to environmental variability.
The BLM needs to consider importance of woody biomass (standing trees) to communities in the planning area and how it will affect wildland fire management plans. Communities may request a higher level of protection for timber lands due to the interest in using woody biomass for energy.
The RMP should acknowledge the important ecological role of wildfire in maintaining wildlife habitat. In addition, through multi-agency cooperation, the RMP should promote the use of appropriate fuel and vegetation treatments for stands of decadent timber/shrub to reestablish early seral stages of habitat.

A concern for all fire management is firefighter safety. Due to the very remote nature of wildland fires in Alaska and the need to put people on the ground without the ability to recover them quickly, the use of aerial fire retardants on BLM-managed lands is of great importance. The use of fire retardant in the initial attack of a fire allows us to secure a “safety area” in which firefighters may take refuge if changing fire behavior warrants. The State recommends the BLM allow the use of aerial fire retardant in the planning area to the maximum extent possible.
In the Alaska Master Cooperative Wildland Fire Management and Stafford Act Response Agreement, land managers (jurisdictional agencies) are required to develop and maintain “known sites” databases to assist in the fire management process. Many of the scoping comments on the RMP seemed to be concerned with traditional use for subsistence on BLM-managed land, or having access to cross BLM-managed land for access of these traditional use areas. The BLM should update the “known [fire] sites” database to include sites associated with these activities such as trap or shelter cabins.
There is concern that managing for lands with wilderness characteristics may influence fire management plans or fire suppression activities such as limiting use of chainsaws or helicopters that greatly affect suppression outcomes.
One commenter requested increased fire suppression around the Bettles ice road. Bettles has had a lot of fires the last 5 years. Last summer's big fire burned over the BLM-managed portion of the ice road. The community is going to have a lot of problems with drifting snow because there won't be vegetation to catch the snow. There are also snags falling across the road.
The public requested clarification about when and how to provide input to BLM's Fire Management Plan, including: what wildfire information the BLM collects for the plan; the role of the Alaska Fire Service (including efforts on non-BLM lands); how the BLM Central Yukon Field Office cooperates/collaborates with Alaska Fire Service; and BLM's fire fighting and local hire practices.
A commenter wanted clarification about how thick timber is managed with fire breaks. Commenters suggested areas around Hughes be cut for fuel reduction or "blazed". The controlled burn that the BLM did in the McGrath area helped a lot. It was suggested the BLM consult the Tanana Chiefs Conference Fire Management Plan.
The BLM should hire the Ruby emergency firefighting crew to do the clean-up work needed at Melozi Hot Springs.
The BLM could use controlled burns for habitat enhancement, specifically to increase moose populations.

A.8. Fish

Access to water sources should be retained to the extent practicable, but maintain riparian buffers, particularly along salmon-bearing waterbodies.
Impacts to commercial salmon fisheries should be looked at on a river-wide basis, as any impacts to salmon in the Central Yukon region will be felt throughout the watershed.
Appropriate construction should be timed to avoid sensitive life stages for fish.
The BLM should consider the impacts of Ichthyophonous on Yukon River Chinook salmon.
The BLM should consider the impacts from salmon by catch in the Bering Sea pollock fleet. This has likely had and will continue to have a significant impact on Yukon River salmon and should be considered in the cumulative impacts of this Central Yukon RMP.
Management of fisheries and aquatic habitat must be flexible and progressive in order to be effective. Fisheries management, reclamation and habitat improvement activities must also incorporate climate change.

Mining activities can negatively affect fish and aquatic resources by degrading or eliminating aquatic habitat; reducing available food sources and water quality; reducing available pool habitat; eliminating riparian vegetation and function; creating sparsely vegetated valleys and floodplains with slow rates of natural revegetation and unstable stream channels with highly erodible beds and banks; altering the longitudinal slope, geometry, and sediment transport rates in streams; and, creating undersized or absent floodplains.
Hardrock mining can have significant adverse impacts on subsistence use, fish and wildlife habitat, water quality, and other important land uses. Hardrock mining is the largest source of toxic pollution in the United States.
Fisheries have been impaired worldwide by releases of acid mine drainage from mining areas. Problematic to the long-term operation of large scale metal mines is the recognition that no hardrock surface mine exist today that can demonstrate that acid mine drainage can be stopped once it occurs on a large scale.
As the number of mining operations increases in a given watershed, the cumulative soil loss and cumulative impact to water quality can have long-term adverse impacts on soil stability, riparian habitat, fisheries habitat and water quality. Cumulative impacts can also result from repetitive use of an area, such as a single OHV stream crossing along a user-created trail.
What measures will the BLM take to protect downstream conservation units from upstream mining impacts?
Although the recovery time for stream rehabilitation objectives may be estimated at 5 to 10 years, several decades may be a more realistic time frame for successful restoration projects. The RMP/EIS should analyze the realistic duration of impacts to aquatic environments posed by in-stream mineral development.
The downstream effects of mining make the activity incompatible with Refuge management objectives. The BLM should maintain the current ANCSA withdrawals and consider additional withdrawals on watersheds that flow onto Refuge lands.
Leaks, spills, sedimentation, and seismic activity associated with oil and gas development may result in fish kills; food web changes, limitations, and shortages; increased susceptibility to disease; feeding disruption; habitat degradation; physiological damage; and behavioral changes.
Fishing and sensitive fish habitat areas in the Koyukuk and Yukon River need to be protected in the RMP. A commenter noted that they were opposed to mining near the Koyukuk and South Fork Koyukuk Rivers where there are set nets. Last summer, dead fish were witnessed along the beach. The RMP should note that on the south fork of the Koyukuk River, there is a salmon spawning area.
The BLM erred in the Eastern Interior Draft RMP/EIS in assuming that lease stipulations and mitigation measures will be sufficiently reliable and effective to avoid harmful effects on clean water, fisheries habitats, bird and other wildlife use of riparian areas, and the enjoyment of pristine recreational float trips.
The public needs maps to understand the locations of mining claims and activity, as well as locations of fisheries resources. Concern was expressed that the BLM lacks the level of information required for developing the RMP.
Concern about temperature changes in the Pacific Ocean affecting salmon returns. Is the BLM studying the effects of temperature changes?
Conjectures about fish habitat impacts resulting from sedimentation produced by OHV recreation should be carefully evaluated and only allowed in the analysis when confirmed by actual site-specific proofs and data.
Consider this planning question. "How will riparian, fishery and aquatic resources be protected from adverse effects of ORV and equipment use in and adjacent to streams?"
The U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game (ADFG) should be consulted on this EIS because of their expertise in and shared management responsibility for Yukon River salmon populations.
The RMP should not allow actions that would threaten the sanctity of the Yukon River or its tributaries, which contain fragile salmon populations.

Outside users should not be allowed access to white fish and sheefish.
Appropriate protections should be put in place for spawning salmon and whitefish.
Apply the adaptive management approach for implementation and effectiveness monitoring to rivers already damaged from suction dredge and mechanized mining before opening any new areas to new mining claims.
Maintain stream channel integrity, channel processes and sediment regime under which the riparian and aquatic ecosystems developed.
The BLM should establish measurable objectives for stream rehabilitation and aquatic restoration goals including: demonstrated channel stabilization, maintenance of sufficient riparian vegetation to provide for floodplain function, and reestablishment of habitat complexity and aquatic communities to pre-disturbance levels.
The BLM must share the stream studies conducted in partnership with the Alaska Department of Fish and Game to provide the public information about the status of important spawning locations. The BLM should further investigate important river and stream habitats for healthy fish migration and spawning to further support the production of these internationally important natural fisheries.
Prioritize research and methods to support and protect unique genetic fish stocks that evolved within the specific geo-climate region.
Additional surveys should be conducted to document the extent of anadromy in all streams.
In analyzing the proposed management action, the BLM must analyze impacts to salmon in the Yukon River and its tributaries. Analysis should include impacts from increased mineral development, including but not limited to: leaching, direct exposure to chemicals at various stages of the salmon lifecycle, and impacts to habitat from mineral development itself and the associated roads. Direct and indirect impacts to salmon should be analyzed for each management alternative, including changes to 17 (d)(1) withdrawal status.
Establish adequate perimeters for seismic activity to prevent damage to fish-bearing streams.
Many people who fish for subsistence also fish commercially – tying their livelihood and prosperity to the health of the river.
The current RMP has worked well to protect the Tozitna River as a salmon spawning stream.
The BLM should look at USFWS studies of the Tozitna drainage (contribution to the Yukon salmon population) and consider what spawning habitat protections could be taken further.
Impacts to salmon stocks should be analyzed in light of the extremely fragile state of this salmon run, and its extreme importance to subsistence and commercial users. The Central Yukon RMP should embrace a precautionary approach, limiting additional mineral and other development unless it can be shown that there will be absolutely no detrimental impacts to salmon populations.
Management measures adopted in the Central Yukon RMP must be compliant with the United States' escapement and habitat obligations under the [Yukon River Salmon Act].
Lake Minchumina provides habitat for northern pike, burbot, whitefish, and an occasional king salmon. In the fall, many schools of fish can be seen while traveling across the lake.
All rivers, streams, and waterways should be put through the Watershed Condition Matrix process during watershed assessments to determine existing watershed condition ratings to provide a rating for baseline conditions before mineral entry is considered in the subunit.
Include the upper Chandalar, Titna, Telsitna, Sethkokna, and Sulukna rivers, and Dakli and Wheeler creeks in designated withdrawals from mineral location and FLPMA sales and leases.

A.9. Forest and Woodland Products

With the high cost of heating fuel, many communities are looking to alternative energy sources such as woody biomass. It appears the BLM has not yet conducted any research regarding biomass or alternative heating solutions for local communities within the planning area. This is evident when comparing the communities within the planning area with Alaska Energy Authority Biomass Projects 2012. Feasibility studies are being conducted for Galena, Ruby, Hughes, Nulato, Koyukuk, and Kaltag, and proposals have been submitted from other communities such as Nenana. Hughes also express an interest in biomass. The community of Tanana has an existing biomass program. The BLM should consider the desire of local area residents to use woody biomass that occurs on BLM-managed lands as part of this planning process.
If the RMP allows for woody biomass harvest, it should also: inventory areas suitable for sustainable biomass; define harvest frequency and maximum size of clearcuts; the minimum separation between clearcuts; and mitigation for increased access and roads. The EIS also should analyze impacts to fish, wildlife, and riparian resources from woody biomass harvest.
Hughes Village is interested in woody biomass harvest within 30 to 40 miles of Hughes. Also some residents harvest firewood, possibly on BLM-managed lands. This is subsistence harvest of firewood.
Koyukuk Village uses BLM-managed lands for firewood. The community is also planning on building a biomass facility. It will use driftwood and wood from Gana-A-Yoo (Village Native Corporation) lands, but harvest of wood from BLM-managed lands may also be needed.
Some people in Galena are using wood-fired boilers. Residents would like to be able to harvest wood on BLM-managed lands near Galena.
There is only one piece of BLM-managed land suitable for firewood harvest that is accessible from Galena. This parcel is important for those residents who cannot harvest wood from Native corporation lands. This parcel needs to be protected for firewood harvest and should not be not conveyed.
One commenter expressed concern about the authorization of commercial berry picking, especially in areas that are not road accessible.
Closures to motorized access will have a negative impact on fire management, firewood harvest, and timber management. The EIS should include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure. These analyses are especially significant following a devastating fire season and a period of rising energy costs. The analysis should also evaluate the cumulative negative impacts of motorized road and trail closures and the conversion of multiple use lands to limited-use lands on fire management, timber management, and firewood gathering.
Lake Minchumina needs access to lands for firewood and log harvest. In the past, the Alaska DNR set aside wood lots, but later reclassified it and ultimately gave most of these lands to Mental Health, meaning that some of our wood lots are now basically private property. We have been told by forestry experts that it takes 40 acres of decent birch forest to sustainably heat an average bush home. This is a lot of acreage that needs protecting around villages and homesites, especially those that rely on spruce instead of good birch forest. In this area, locals may travel 10 to 15 miles for good cabin logs.
Wildfire burns are a good source of firewood.
Consider and coordinate with the Tanana Chiefs Conference wood harvest plan when developing the RMP.
The BLM must carefully manage timber harvesting in the planning area – only allowing subsistence harvest and targeted biomass harvest projects.

A.10. Government-to-Government Consultation

Commenters asked for clarification of the process on how a tribe becomes a cooperating agency.
The BLM should consider adding the Native Village of Nuiqsut and Kaktovik to the tribes consulted.
The Village of Crooked Creek warned the BLM that other organizations have tried to speak on behalf of their tribe, but they speak for themselves and no one else may comment on their behalf.
The Draft EIS should describe the process and outcome of government-to-government consultation between the BLM and affected tribal government(s), the issues that were raised, and how those issues were addressed.
Alternative dispute resolution should be utilized to ensure successful outcomes. Working to resolve difficult conflicts will improve the reputation of the BLM and foster ownership of the resource management plan.
All too often consultation meetings become public presentations from government agencies with little two way conversation – leaving a feeling that no one was listened to and nothing good came of the time spent. Over time these interactions lead to great mistrust and disenfranchisement with the system. When comments are submitted by tribal authorities they are often labeled as non-substantive because they state preference or opinion. This causes further disenfranchisement as some of the most respected members of the community do not even have their voices heard.
The BLM must keep tribes informed of the RMP per Executive Order 13175 which resulted in a Tribal Consultation Policy. Anytime that tribes want to have a government-to-government meeting, they can request it. Several commenters asked if consultation with the tribes in the planning area had been initiated and if tribes have responded. Tribes noted that they should advise management decisions that would affect subsistence resources directly or indirectly like water resources
Effective communication from tribal membership is necessary in order to have tribal recommendations at a level where they are effective in influencing the decisions in the RMP. The tribes should have a seat at the table. It feels as though the BLM dictates what the RMP will do regardless of what tribes want. The process is fragmented, requiring tribal members to go to many different meetings when resources like caribou and fish are regional in scale. Tribes are only allowed to have micromanagement of their own lands.
The BLM should consider reorganization of the tribal liaison function in Alaska, including adding additional capacity for each planning effort, to achieve effective connections with tribal governments and to assure robust government-to-government relations. A tribal liaison should be identified on the RMP website.

A.11. Non-Native and Invasive Species

The BLM should also consider invasive species management and mitigation that may affect fire suppression activities.
The BLM should develop relationships with adjacent land managers and users to address issues of invasive species introduction, spread, and management.
Would not like to see any requirements to pick up horse or dog fecal matter as part of the effort to reduce spread of weeds.
The BLM should identify the extent of the spread of invasive non-native plants. The RMP should include a section that identifies management priorities and describes the recommended methods for preventing and eradicating invasive weeds.
The RMP should include information about existing aquatic invasive species infestations and how they would be managed to prevent further deterioration of water quality within the planning area.

The RMP should include information about how waterbodies in the planning area will be protected from aquatic invasive species introductions.
Commenters expressed concern regarding the use of chemicals to kill the weeds because the chemicals could poison water and plants. One commenter noted they would rather have sweet white clover than poisoned blueberries. A commenter asked if the BLM is monitoring for impacts to local and migratory birds from use of herbicides.
Eradication techniques may be just as or more damaging than the invasive plants.
Comments asked for clarity on eradication measures for invasive plants including: <ul style="list-style-type: none"> • Have any invasive plants been eradicated successfully? • How much does invasive control cost? • How high a priority is this program?
Along the Dalton Highway where invasive plants have been observed, one commenter provided a theory on why invasive plants are moving so rapidly up the Dalton Highway: they observed ADOT and PF pushing the melting snow (that contains invasive seeds) north along the route. The equipment working in the infested areas moves north with the contamination. The commenter suggested that the BLM should work with the State to prevent this impact from road maintenance because it is propagating the invasive plants. Equipment should push snow south, away from the invasion, back to the origin. A commenter noted that hydro-seeders are propagating invasive plants during re-seeding of disturbed areas.
Don't waste money we don't have on invasive species.
Should management of invasive plants be the responsibility of permittees (with compliance checks by the BLM), including those with ROW and Special Use Permits? Should renewal be contingent on successful performance?
Invasive plant species are a concern to the communities along the rivers in the planning area. When rivers rise, the high waters could spread the invasive plants/weeds. The invasive tall white flowers have been observed. Commenters asked what planning should be done to try to get rid of invasive species and if anyone goes out to those areas to determine what is spreading them. One commenter stated that they do have invasive plants in the Nulato area.
In Galena there was a study and it found that seeds were brought in on the barges and trucks. Seeds were washed off the tires of trucks and some of the plants grew really fast so the response was to dig the invasive species and bring them to the dump.
There is concern regarding the spread of invasive species and what measures the BLM is taking to monitor invasive species and weeds in the planning area. There is concern about invasive plant species spreading into the nearby refuges and the waterways in the planning area. Invasive weeds have been observed on the Dalton Highway in the Utility Corridor. The public asked how the RMP will address and consider this issue, particularly on the Dalton Highway.
How will the BLM address transportation of invasive species where off-highway vehicles and other equipment and machinery are permitted and where proposed roads cross streams?
The RMP should contain a fair evaluation of all sources and uses that contribute to the noxious weed problem including hikers, mountain bikers, and equestrians (non-use of weed-free hay for example). The document should also fairly evaluate how natural processes and wildlife spread noxious weeds. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors and with a realistic representation of noxious weeds natural ability to spread versus a relative magnitude for every activity's contribution.

A.12. Minerals (Mining, Oil and Gas, Coal, Gravel, Geothermal)

MINING
The RMP should close areas to mining that may be susceptible to acid mine drainage problems to preclude any irreversible impacts to public lands.
Commenters asked for clarity regarding who manages the Illinois Creek Mine and if it is located on Native corporation land such as Doyon. Concerns that affected villages should all have the same chance to operate in an area. The RMP should evaluate the impacts to local rural economies if mines of five acres are allowed.
<p>Throughout the planning area, the public asked for details about mining activities near their communities and the process by which communities are notified if and when mining occurs. Questions raised during scoping included:</p> <ul style="list-style-type: none"> • What is the estimated duration of the gold and copper deposit near Koyukuk? • What is being mined near Big Salt? • What is the mineral access to the Ray Mountains? What types of minerals are located there and what is its proximity to Spooky Valley? • What is the duration of Nova Gold's gold and copper exploration? When they get the copper, how are they going to process it? • What are the resources in the Ray Mountains? Is there a gold mining operation there now? • How is the Taiga Mine being managed up by the Hog River? • What are the geological studies conducted in the area near Ruby? • Are there a lot of mining permit requests near Allakaket or in the entire Central Yukon area?
The RMP should require best practice standards for acid mine drainage. Metals leaching analysis and predictive modeling should be a required component of any NEPA analysis for mineral development on federal lands.
The Central Yukon RMP should describe areas that are open and closed to mining and mineral leasing; specifically, the area north and west of Lake Minchumina.
To ensure reclamation and prevent unnecessary and undue degradation, the BLM must require the calculation and collection of an independently guaranteed, liquid, form of financial assurance sufficient to cover the full cost of reclamation as conducted by a third-party for any large-scale mining operations on BLM-managed land. It should incorporate the reclamation bond calculations within the NEPA process, and provide for public comment.
As directed by the Mining and Minerals Policy Act of 1970, the RMP should encourage the development of the mineral resources of the planning area and emphasize that mineral development under today's mining regulations can be performed in an environmentally safe manner as our [Taiga Mine] operations have proven for the past 24 years.
Multiple use includes mining (exploration, leasing, development) for oil and gas, coal, and minerals, as well as recreational and other potential uses. With less than 1 percent of Alaska in conventional private ownership, access should be available on other lands.
Small-scale miners are not allowed access to BLM-managed lands in the Inner Utility Corridor. The inner corridor should be opened to mining, particularly near Wiseman and Coldfoot.
Jobs associated with mines typically only last 4 to 5 years, but the mining activity has long-term impacts on the subsistence way of life.
Commenters asked if regulations, stipulations, and required operating procedures detailed in the new plan apply to all claims evenly or would the claimants have valid prior rights that would exempt them from the new plan.
The BLM should clarify the process of closure and reclamation of mines, and the required public notification process in the Central Yukon RMP.

Mining used to be considered a subsistence activity and the community at Wiseman exists because of mining. The Dalton Highway should be managed for "real traditional uses - small mines and subsistence", at least through the Brooks Range in order to keep it the way it is and there should be a middle ground for management. Small time mines are part of the culture near Wiseman, whereas big guiding and large-scale mines are new, not traditional.
There are impacts to subsistence fishing from mining in the Clear Creek and Hog River areas which are spawning grounds for salmon.
Unwanted mining (on non-BLM-managed lands) could be accomplished by limiting access roads through BLM-managed lands.
Management of existing placer mining, and the cumulative impacts of existing and potential future placer and hardrock mining across the region should be addressed for parameters including water quality; fish habitat, including stream invertebrate populations and streamside vegetation; riparian vegetation; boreal forest bird habitats; moose and other wildlife habitats; subsistence resources and use, and recreational values.
There are already enough regulations governing mining and there is no need for additional regulations.
The BLM must ensure that exploration activities, such as drilling, do not adversely impact water quality, fisheries and subsistence resources.
Known mineral occurrences/trends should be considered when evaluating which lands are to be managed for mineral development and surrounding areas should be open for mineral entry.
Areas like the Central Yukon that have not been inventoried should be open to development and mapped by the U.S. Bureau of Mines, and listed as favorable for mineral discoveries. The potential for mining in the area should be fully considered and designated as such in the RMP.
The Central Yukon RMP should contain a thorough discussion of the mineral potential of the area, not just the likelihood of development of already identified mines, prospects and mineral occurrences. An ideal mineral-potential section of an RMP would review all data related to regional geology, geochemistry and geophysics, and include maps, data summaries, and a thorough discussion of geologically-based mineral deposit models and their likelihood of occurrence within the RMP area. This type of material can and should be provided by the U.S. Geological Survey, who are notably absent in the development of many RMPs.
Monitoring should occur before and after development. Past monitoring and compliance activities for hardrock and placer mining should be evaluated.
The BLM should put in place specific performance standards for mine operations.
Cost should not be a factor when reasonable standards have been set, particularly in a high metals market.
Travel associated with mineral activities will require closer monitoring. Monitoring will require notification and posting for snow machine and OHV travel restrictions during these time periods.
The mining community has more than enough restrictions on it already. If anything the small miners should have less restrictions.
State top-filing outside the Utility Corridor, in the upper Jim River, upper Prospect Creek Forks and the forks of Bonanza Creek should not be approved.
The BLM needs to report on the number of active placer mines there are today and make available to the public baseline surveys, permitting reviews, monitoring, compliance, and rectification of any identified problems.
Trucks transporting ore have caused extensive metals pollution.
The RMP should take a precautionary approach, and retain the ANCSA d(1) status for all lands that are important for subsistence use, fish and wildlife habitat and other important uses for the region that could be impaired by mining activities.

More areas should be opened up to mining.
Areas that should remain, or be withdrawn, from mineral entry include: All lands within proposed Research Natural Areas, Areas of Critical Environmental Concern, Wilderness Study Areas, lands with wilderness characteristics, special recreation management areas, lands within 400 feet of anadromous rivers and streams, VRM Classes I and II areas throughout the entire planning area, primary fish spawning habitat, and community drinking water aquifers.
Existing mineral withdrawal areas should be maintained in full, and additional withdrawals should be implemented so as to protect the quantity and quality of water flowing into national wildlife refuges and other federal conservation lands.
The BLM should take a hard review of past and existing operations prior to any consideration of classifying any additional lands open to mining.
Existing withdrawals should be maintained in this resource management plan for the Utility Corridor and CAMA Wilderness Study Area, and those areas in the Central Yukon region of the planning [area] which still have withdrawals in place.
Retain current withdrawal status.
Make the Tozitna River off limits for any type of mining.
Leave the Ray Mountain in wild isolated condition — no mining or park developments.
No large-scale mineral extraction. No new roads in areas where locals are opposed to roads. Keep the areas surrounding Lake Minchumina closed to new mining claims and mineral leasing. Expand these closed areas if possible.
All BLM-managed lands east of the pipeline corridor in the South Fork of the Koyukuk, Jim River, Prospect Creek and Bonanza Creek should remain closed to mineral entry.
All BLM-managed lands adjacent to the south and southeast border of the Kanuti National Wildlife Refuge should remain closed to all forms of mining and mineral entry. These areas drain into the headwaters of the Kanuti and its Kilolitna Forks headwaters and are critical to the wetlands habitat in the Kanuti Refuge.
The small block of BLM-managed land in the heart of wilderness, in upper Your Creek, adjacent to the southwest boundary of the Arctic National Wildlife Refuge, should remain closed to mineral entry & leasing.
The hills along the north boundary of the Yukon Flats NWR, south of the South Fork of the Koyukuk and the three forks of the Chandalar (the long finger extending east from the planning area), should all remain closed to mineral entry and leasing.
The block of BLM-managed lands south of the east finger of the Selawik NWR should be retained by the BLM and not transferred to the state of Alaska. Mineral entry and Mineral leasing in this area should remain closed.
The RMP should include a comprehensive assessment of the reclamation success for recent and current placer mining operations, including the feasibility and cost-effectiveness of proposed rehabilitation procedures now being considered by the BLM. If the assessment concludes that mined streams and floodplains are not being reclaimed to geomorphological and biological function in a clearly defined time period and cost effective manner, and is unable to demonstrate methods and procedures to realistically achieve these objectives, all alternatives offered in the RMP should include a moratorium on opening BLM-managed lands that are currently closed to mineral entry, as well as disallowing expansion of current placer mining operations into previously unmined portions of drainages.
Institute and/or continue reclamation activities of historic and current damages from development and mining.
The BLM needs to recognize and protect valid existing rights established under the General Mining Act of 1872 and allow the mining claim owners their right to access, possession and occupancy, reasonable permitting for subsistence mining less than 5 acres.

Mining activities should occur in only the limited areas in which the BLM's enforcement personnel have a realistic possibility of actually providing effective oversight of mining operations.
OIL AND GAS
The BLM should add text to reference subsurface mineral estate resources in the planning area (oil, gas, and geothermal).
The BLM should develop a suite of best management practices and performance standards for activities associated with oil and gas development.
The agency must consider the cumulative impacts from regional oil and gas development and the cumulative impacts to adjacent lands from oil and gas development. This analysis should inform the manner in which the BLM allocates lands as available or unavailable for oil and gas development and the conditions under which development may be permitted.
The BLM must consider a range of alternatives that will address how to handle currently leased lands that are not developed and are either terminated or expire.
Coordination with the Alaska Regional Response Team members should be undertaken throughout this planning process to ensure adequate emergency response considerations in planning efforts, particularly since oil spill prevention and response capability is one of the primary concerns for the planning area.
What are the circumstances in which the BLM would allow the use of fracking to extract oil and gas?
The BLM should work closely with the State of Alaska to ensure that new oil and gas field developments have minimal footprints and use the best technologies and best practices for infrastructure.
For lands available to oil and gas development, we recommend lease stipulations that cannot be waived, best management practices, and conditions of approval to protect their resources, such as wildlife habitat, water quality and wilderness characteristics.
The State opposes any BLM management practices or restrictions that negatively impact the State's oil and gas exploration licensing opportunities in the planning area.
<p>The following are suggested additions for the Fluid Minerals Section:</p> <ul style="list-style-type: none"> • the BLM will coordinate all project authorizations and mitigation efforts with the non-federal landowners within the planning area to maintain consistency among land uses and mitigations. • the BLM will consider and incorporate where applicable local State and local government regulatory criteria and oversight to provide regulatory consistency. • Restrictions or closures of federal land that is contiguous with non-federal land must get prior written concurrence from the non-federal landowners prior to implementation. • the BLM will collect, evaluate and provide management policies for access, exploration, development, and transportation of subsurface oil, gas, and geothermal resources in the planning area. • the BLM will not restrict access to surface and subsurface resources on contiguous non-federal lands.
The petroleum resources in the planning area have not been definitively delineated, and the lack of information presented in the preparation plan does not reflect the actual resources assessment data that is currently publicly available, or the likelihood of these resources throughout the area.
The RMP should open leasing on federal lands, or keep exploration and leasing open in the basins with resources potential.
Areas identified with petroleum potential should not be restricted from leasing based upon lands with wilderness characteristics, or on restrictions due to visual resources management inventories. It is important that the RMP accommodate responsible access to State, Native, and private lands, and does not preclude oil and gas exploration and development on these lands.

Allowing new development to more lands through the revocation of ANCSA (d)(1) withdrawals should not be allowed without serious consideration and critical areas should have limitations and closures.
Roads are not essential for oil and gas and mining development. Consider roadless development.
Crude oil transmission pipelines without roads should not result in increased air traffic as there are federal requirements for monitoring rights of way (biweekly monitoring with aerial monitoring used most commonly, see 49 CRF 195.412(a)), typically done by air.
There should be a preference for single-phase pipelines. This preference would require separating these materials at the well-pad and ensuring that long-distance transmission pipelines contain just crude oil.
It is timely to include reference to the State incentive programs legislated to promote increased exploration and interest in oil and gas resources throughout the planning area (ADOR 2013).
The RMP should include a description of current State licensed projects such as those in the northern foothills of the Brooks Range, possible construction of a road to the Umiat area, and Doyon's exploratory drilling.
COAL
The harsh arctic climate, relative humidity, and thermal fluctuations, as well as abundance of surface water and the structural composition of the earth, including permafrost and ground ice, constitute a coal mining environment like few in the world. Impacts associated with support infrastructure to facilitate the operation persist, and are more difficult to mitigate. Impacts of surface mining are more severe and arctic mines are difficult, if not impossible to reclaim due to slowed vegetation and geologic adaptations. Surface-mining impacts include surface-environment degradation from infrastructure and pit, as well as permafrost thaw, alteration of aquatic ecosystems, and degradation of air quality.
Coal mining activities can introduce coal dust to the air and water, which is often very fine and contains heavy metals. Degraded air quality from these activities and also from truck and mining equipment emissions can have an adverse impact on human and animal health.
Coal is one of the worst carbon-dioxide producers affecting global climate, with natural gas and oil close behind. Any coal industrial activities will then contribute to global warming, which disproportionately impacts the Arctic.
Burning coal releases mercury that can then bioaccumulate in fish, which then pass up the food chain to humans sometimes at toxic levels, especially in women. If local communities cannot consume fish, it will be detrimental to their health and culture. The impacts from mercury contamination must be taken into account in this EIS.
The EIS should fully consider the cumulative impacts of coal projects on other lands besides BLM-managed lands.
The RMP should prohibit coal exploration and production on BLM-managed lands.
The southern half of the planning area contains five coal-bearing sedimentary basins that contain bituminous and lignitic coal. These are the: Nenana coal basin, Jarvis Creek coal field, Nulato coal field, Rampart coal field, Tozitna coal district, and Upper Koyukuk Basin that includes the Tramway Bar coal field. The Nenana coal basin is the site of active coal mining at Usibelli Coal Mine. The Nulato, Rampart, Tramway Bar, and Jarvis Creek coal fields have records of past coal mining. Additionally the northern half of the planning area contains significant coal deposits in the Nanushuk and Sagavanirktok formations. Access to and future development potential of the coal deposits in both the southern and northern portions of the planning area should be considered.
There are a number of coal occurrences along the Yukon River between Galena and Rampart. These deposits were mined historically during the steamship era and there exists potential for further development. Doyon Ltd. has conducted several studies of these Yukon River coal deposits and should be consulted for the RMP.
GEOHERMAL

The entire planning area should be open to geothermal resources exploration and leasing, along with mineral entry for other compatible coal, mineral and related leasing and industrial developments. In addition, the definition of fluid minerals should include geothermal resources.
There are known geothermal areas in the planning area. Sites actively used for recreation or other uses include: Manley Hot Springs, Tolovana Hot Springs and Selawik Hot Springs. Melozi Hot Springs was historically used as a recreational site and may provide economic benefit to the local area. Eighteen other thermal springs in the planning area include: Dulbi, Hawk, Hornor, Hutliana, Little Melozina, Lower Ray River, Upper Ray River, Kanuti, Ishtalitna, McQuesten, Kilo, No Name, Pocahontas, South, Sun Mountain, Tunalkten Lake, Upper Division, and Upper Ray River, some of which have occasional recreational use. Maintaining access to all these sites should be considered in the RMP.
It is likely that geothermal resources are present in the planning area. The State has an active geothermal resources exploration and development program that has potential for growth in the planning area. Geothermal resources are managed under AS 41 .06.005, with primary administration of exploration, leasing, and oversight shared in partnership among the DNR, Alaska Oil and Gas Conservation Commission (AOGCC), and Department of Environmental Conservation (DEC.)
Access for exploration and development are needed to locate and develop direct-use and the multiple benefits of geothermal energy. There are known geothermal resources in the Middle Yukon Drainages and Fairbanks Subunits, and potential for new sources to be developed throughout the planning area. Geothermal deposits have been tapped and developed at Chena Hot Springs near Fairbanks.
GRAVEL
A thorough assessment of existing, future and abandoned gravel mines needs to be conducted by the Alaska Department of Transportation (ADOT), the BLM, and the oil and gas industry for existing Trans-Alaska Pipeline operations. This assessment should also consider future natural gas pipeline operations. This is essential information for gravel mine management, evaluation of cumulative effects, and evaluation of direct and cumulative impacts of gravel mines from new industrial uses, such as the Umiat Road and Ambler Road projects.
Gravel mine excavation, wetlands fill and associated hauling via truck is not an appropriate land use for the Galbraith/Toolik Lake area because of its special scenic, scientific, rare and sensitive plants, cultural, archeological, and recreational values. We are concerned because the application from ADOT to the Corps of Engineers failed to identify the special land use designation of this site of its project, as well as the impacts to scenic, recreational and other values.
Mineral material extraction (gravel) sales should not be generally allowed throughout the Central Yukon plan area (as is currently the case in the Utility Corridor area per the 1991 plan). Gravel mining should be prohibited in ACECs, RNAs and other special sites such as the Jim River area. Gravel mine plans should be developed so that incompatible uses in sensitive areas do not occur.
Careful consideration of the impacts of extensive gravel mine sites, including consideration of specific site placement alternatives is needed. Gravel mine sites constituted the single greatest use of land and single largest source of direct habitat loss during the construction of the Trans-Alaska Pipeline System within the North Slope section (north of Pump Station 4). The number of acres used for material sites exceeded the acreage predicted.
Mineral materials (e.g., sand, gravel, rock) are needed for the development, maintenance, and expansion of critical infrastructure such as roads, pipelines, airports, and similar types of projects. Transport of materials over any significant distance (e.g., more than 1,000 feet from an existing road) quickly makes their use cost prohibitive, thus lack of materials sites within a reasonable distance from projects effectively prevents maintenance and development activities that are necessary and desirable.

<p>The RMP should explicitly address the issue of mineral material sources (e.g., sand, gravel, rock) to facilitate appropriate development and maintenance activities in the planning area. It is critical that consideration be given to identifying existing and prospective transportation corridors and related infrastructure, and the mineral material resources (sand and gravel, fill, etc.) that are required to support permissible development and maintenance. Similar consideration should be given to identifying such critical resources in any areas in which infrastructure currently exists in support of local communities, as well as anticipated community expansion and access needs. Also to identifying such critical resources in any areas in which mineral or energy resource exploration and development activities currently exist or are permissible during the life of the RMP.</p>
<p>The BLM should consider a decision in the RMP that areas within 1,000 feet of existing and planned infrastructure and community development should be managed for materials resources in order to facilitate necessary maintenance and appropriate development.</p>
<p>The ever growing number of material sites (gravel pits) along the Dalton Highway is of concern. Each pit is additional loss of habitat and a potential source of invasive plant species. Material sites along the highway must be developed in a manner that minimizes their cumulative negative impacts along the highway corridor. A team of mineral rights owners (Alaska DNR and the BLM), local residents, natural resource agencies and potential users (ADOT and PF oil and gas pipeline companies) should be assembled to develop a plan that includes strategically located material sources for multiple projects anticipated along the Dalton corridor. Perhaps this would fit into BLM's suggested "development nodes" for shared use in the Dalton Highway Corridor.</p>
<p>Comments expressed concern that Alaska Department of Transportation does not consult with local communities about gravel pit siting and there should be alternatives for sand and gravel pit sites. The gravel pits within the Scenic Byways were not well-chosen. Some lands are better suited for gravel pits than others. Dietrich Pass was noted as a suitable area as it has access and is low-profile near the river. There should not be a gravel pit at Sukakpak Mountain as this area is next to the road and a gravel pit would ruin the character of the Scenic Byway where poor soil conditions are present.</p>
<p>The BLM should consider a process to approve the request for gravel extraction as long as there is minimal damage. There isn't anything of value except gravel and swamp.</p>

A.13. Special Designations (ACECs, RNAs, WSR, Wilderness)

AREAS OF CRITICAL ENVIRONMENTAL CONCERN, RESEARCH NATURAL AREAS
<p>Analyze the upper Chandalar River for designation as an ACEC, from the East Fork Chandalar River/Chuttoh Bluffs to Caro. The Chandalar River drainage provides essential fisheries habitat for Chinook, summer and fall chum, coho, whitefish, and cisco (Brown et al. 2012, Melegari 2012, Rost 1986), and critical subsistence resources for all Alaska communities which harvest fish from the Yukon River. Radio-telemetry data suggest that the Chandalar River contributes 2 to 4 percent of the statewide run of Chinook that enter the Yukon River annually (Eiler et al. 2006a, 2006b). Radio-telemetry data (Martin 2013, unpublished data) collected in 2003 and 2004 documents spawning Chinook present in the Chandalar River from Venetie upstream to the East Fork, main stem, and West Fork (Martin 2013). With one-third of the entire Yukon River fall chum salmon population utilizing the Chandalar River, this discrete population is the largest fall chum population of the Yukon River drainage and provides an essential food source for users throughout the Yukon River basin and a primary resource for Arctic Village, Venetie and Fort Yukon. ADFG subsistence harvest data reported the community of Venetie reported harvesting 1,938 fall chum, 10 chinook and 34 coho in 2011. The physical attributes which make the Chandalar River productive fisheries habitat are understudied but it is suspected that a combination of upriver water upwelling and other physical features contribute to its high fisheries production.</p>
<p>Presently there are increased mining activities in the upper Chandalar watershed which pose a threat for water quality and downstream fisheries spawning habitats. The Fish and Wildlife Service is specifically concerned about that stretch of the Chandalar River upstream from the East Fork/Chuttoh Bluffs to Caro and proposes that this area be carefully studied and evaluated for designation as an ACEC. The existing 1970s withdrawal from mining laws should be retained to further protect the valuable subsistence fisheries resources. Additionally the area should be afforded protection from road access.</p>

The BLM needs to strongly consider closing ACECs to mineral location. Some areas currently designated as ACECs are open to mineral location under the General Mining Act of 1872 (Central Yukon RMP p. 20). Entry should be prohibited in order to maintain the other uses that currently take place in those ACECs.
Existing ACECs need to be reviewed. Significant areas within or adjacent to a number of the ACECs in the planning area have been conveyed to Doyon, Limited and the State. Doyon now owns significant land holdings near the villages of Kaltag, Galena, Ruby, Tanana, and Hughes. As a result, significant portions of the Nulato Hills, Dulbi-Kaiyuh Mountains Subunit, and Galena Mountain ACECs, among others, are no longer in federal land status, and should be removed formally from ACEC designation. Other areas within the ACECs may no longer be appropriate for continued designation because of the status of adjacent lands or for other reasons.
The RMP should not 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. Such areas are unlikely to meet the regulatory criteria for designation of ACECs. Areas under consideration for ACEC designation that contain substantial areas of land that are in the process of conveyance or are high priority Doyon, Limited, and State-selected lands are unlikely to be retained in federal land status and ACEC designation is inappropriate.
The Kateel, Box, and Inglutalik River ACECs/RNAs should be expanded north to include the Tagagawik River and all BLM-managed lands north to the boundary of the Selawik National Wildlife Refuge. These ACECs/RNAs, as well as the Nulato Hills ACEC, are critical migration routes and winter range for the Western Arctic Caribou Herd. The BLM-managed lands along the eastern flanks of these ACECs should remain closed to all forms of mining and mineral leasing.
The peregrine falcon was provided habitat protection in several existing ACECs due to its threatened species listing. These protections have made a difference for this species. Existing protections should not be removed to allow for mining or oil and gas surface disturbing activities. Other raptors may also use riparian cliff areas and adjacent hunting grounds used by nesting peregrine falcons, and other riparian species may be protected by the existing ACECs.
The BLM should consider these goals for ACECs: 1) Identify the resources and support necessary to promote and maintain the wild, scenic and scientific qualities of ACECs; 2) Identify (further) rehabilitation and reclamation needs within the ACECs; 3) Develop management objectives that protect and enhance the resource values, including prohibiting activities that would degrade the qualities of current and potential designations; 4) Close all designated ACECs to mineral development; 5) Designate wildlife corridors as ACECs with strong protections; and 6) Prohibit road development within RNAs and ACECs off the Dalton Highway.
The Jim River ACEC should be expanded to include the Jim River drainage, S. Fork Koyukuk, upper Prospect Creek, and the forks of Bonanza Creek. The alpine zone of the Jim River Mountains seems to be vegetatively distinctive in that lichen communities and primary successional heath communities form unusual and dramatic islands among extensive lichen covered granitic talus slopes. This is a strikingly beautiful valley with remarkable rock glaciers. The Jim River is a significant salmon drainage and provides quality hunting, trapping, and grayling fishing opportunities. Additionally this area connects Yukon Flats and Kanuti National Wildlife Refuges along a low-altitude corridor. The expanded ACEC should be closed to mineral entry as mining or road construction would severely impact this narrow river valley.
The Kanuti watershed comprises a highly scenic and productive basin upstream of the highway, and provides a higher-altitude connector between Yukon Flats and the Kanuti National Wildlife Refuges. Viewed from Finger Rock and the Dalton Highway the upper Kanuti basin is a lovely and distinctive arctic landscape that should be protected so that tourists driving the road and Alaskans can continue to enjoy this place, and hunting opportunities remain uncompromised. An ACEC closed to mineral entry might protect this special, scenic valley.
The BLM should analyze and consider designating the Kanuti River and the Kanuti-Kilolitna River drainages as Research Natural Areas (RNA)/Areas of Critical Environmental Concern (ACEC) to protect rare plant communities and cultural resources. Both river corridors host relic Beringia vegetation communities, and notable archeological sites. These drainages are untrammled and offer outstanding opportunities for solitude and primitive recreation. Further, they host adjacent vegetation communities that are either rare or diminishing on the landscape (relic Beringia vegetation communities [Lipkin 2007]); old growth spruce/lichen habitats), scenic tors, serpentine soils, and active golden eagle (BLM sensitive species) nesting territories.

The BLM should maintain and possibly expand the current ACEC for Kateel and Gisasa Rivers. Both provide critical spawning habitat for subsistence fisheries. They should be closed to mining. Nulato Hills is some of the wildest lands in the state. Additionally the following rivers should be assessed for designation as an ACEC: Dakli Creek, Wheeler Creek, Sulukna River, Titna River, Telsitna River, and Sethkokna River. Justification: Maintaining water quality and quantity in areas of known spawning grounds that are critical for providing subsistence resources for the surrounding villages.
The Indian River and Hogatza River Tributaries ACECs should be monitored more carefully to detect if mining in these areas is affecting the values for which these areas are being managed (salmon and sheefish spawning areas). BLM-managed land in the upper Hogatza River could be affected by one of the more southerly route proposals of the Ambler Road.
The BLM should designate new ACECs to protect anadromous fish and lands adjacent to anadromous streams, caribou habitat (calving, wintering, foraging, and migration), and habitat for rare and imperiled species in the planning area. Protections of uplands adjacent to anadromous streams would protect the Yukon River drainage as it intersects with BLM-managed land. ACEC protections on the BLM-managed land adjacent to the Yukon River and its tributaries could help king salmon runs as this declining population trend over time is of a serious conservation concern.
The RMP must evaluate a range of alternatives including ACEC designations to protect sensitive and important resources in the planning area and should establish robust management prescriptions to ensure real protection for the resources which ACECs are designated to protect.
ACECs should be established to provide real protections for near-shore rearing habitat for fingerling and smolt.
The BLM should consider designating corridors between conservation units as ACECs to protect the outstanding qualities of these areas as well as to promote connectivity between other units.
Depending on the realities of current land status, the BLM should retain all existing ACECs in the planning area and expand and improve management prescriptions to protect these important places. Keeping these special areas closed to mineral development is a high priority.
The BLM should leave the Tozitna River ACEC, both Tozitna Subunits South and North, and the McQuesten Creek, Spooky Valley and Ishtalitna Creek Hot Springs RNAs in place as they are for the next 20 years. Let our descendants have a chance to make that decision. The area is doing just fine now.
Any proposed extension of the Snowden ACEC to the east that would fully encompass the headwaters of Mathews River is unnecessary. The Snowden ACEC adequately and effectively protects sheep habitat as is, in the vicinity of Snowden Mountain. The headwaters of Mathews River has a documented history of continuous and existing recreational use over the last 47 years that includes limited ORV use by occupants of a single private land in-holding. Limited ORV use by this land owner within the Mathews River corridor has not negatively affected sheep or sheep habitat.
The Sulukna River provides critical sheefish spawning habitat for subsistence fisheries and portions are currently open to mining. The BLM should maintain or expand the current ACEC for the Sulukna River and close the lower portion of the river to mining.
All BLM-managed lands north of the Yukon River in the Tozitna River ACEC, and its north and south subunits, as well as all the Ray Mountains, all the way to the Kanuti National Wildlife Refuge boundary, should be retained by the BLM. State tentatively selected lands in this area should not be approved. The Tozitna ACEC should be expanded north to include all these tentatively selected State lands. All BLM-managed lands in this area should be closed to all mineral entry and leasing.
Many commenters were in support of retaining the Galbraith Lake ACEC. Reasons cited included aesthetics and research.
The BLM should consider combining the Redlands and Arms Lake RNAs into one larger RNA encompassing most of the BLM-managed lands in the area. The enlarged RNA should be managed for its unique qualities.

<p>RNAs need to be an adequate size to protect the integrity of the system. The BLM should review the success of current RNA management related to the size of these areas to determine if the originally proposed areas are serving their true purpose.</p>
<p>The BLM should analyze if all hot springs should be designated as research natural areas as hot springs host unique vegetation communities in the Arctic and Subarctic.</p>
<p>The BLM should consider combining the Lake Todatonten Pingos and the South Todatonten Summit RNAs into one larger RNA. The combined RNA should be managed to maintain the unique qualities for which they were designated.</p>
<p>The Oksrukuyik River watershed should be designated as a RNA for the purpose of research and education, rather than as a Wild and Scenic River. This watershed is representative of the common geologic, soil, or water features (43 CFR 8223) in the area and is highly useful for basic and applied research that is relevant to land management and environmental stewardship in this region of Alaska. The Oksrukuyik Creek watershed has a rich history of research activities and continues to be very productive in this regard. Short and long term studies have been geared towards gaining an improved understanding and ability to predict the effects of environmental change on arctic landscapes. The long term monitoring and observing activities and experimental manipulations that have taken place to date have been fundamental in enabling a better understanding of the ecology of the surrounding tundra, streams, and lakes and of the controls of ecosystem structure and function, enabling better land and natural resource management in the region. The investments that have been made thus far and the benefits of all that stands to be learned through future research activities. Restrictions that a Wild and Scenic designation would impose would represent a loss of both the investments that have been made thus far and the benefits of all that stands to be learned through future research activities.</p>
<p>The resources in the planning area include many values that merit protection through special administrative designations. Protection of existing ACECs and due consideration of newly-proposed ACECs, RNAs and outstanding natural areas, must be a priority in the Central Yukon planning process. Also designation of Wild and Scenic Rivers should be considered.</p>
<p>Continue the restriction on overnight camping in Toolik RNA because this restriction: reduces interference with research projects; similar camping sites are readily available outside the RNA;</p>
<p>The current plan does not allow camping in the Toolik RNA. The BLM should evaluate if recreational camping can be allowed in the southern region of the Toolik RNA, which is adjacent to Arctic National Wildlife Refuge Atigun River Gorge area, without impacting the identified cultural and research activity values.</p>
<p>Many supported the recommendation of the Toolik Field Station Management Team and Steering Committee: The boundaries of the Toolik Research Natural Area (RNA) should be expanded as shown in the submitted map. Because of the expansion of long-term research programs beyond the current boundaries of the RNA, we request that the BLM expand the area included in the Toolik RNA primarily eastward, with a small extension south to the area just north of the Atigun River along the Dalton Highway. There are more than 14,000 scientific research plots in the vicinity of TFS, and the expansion of the RNA proposed here would pick up most of the current research plots that are on BLM-managed land in the area. We recognize that the current and proposed expanded areas of the Toolik RNA include lands within the Alaska pipeline corridor and that this status will not change.</p>
<p>The Toolik RNA should be continued and enlarged to include important research sites outside of the current boundary. More specifically, the RNA designation should also be applied to existing research areas around Atigun, which are located as to not prevent access to Atigun canyon by other users.</p>
<p>The BLM should consider expanding Toolik RNA to the south, north, and west of the current RNA. Invaluable research has already come from the current RNA and expanding the area designated for this use will ensure continued research for the benefit of all Alaskans.</p>
<p>Consider expanding Toolik RNA to include some of the key research sites outside of the current RNA. Expansion to the south is needed to include the sites near Atigun. To the north and east, there are important research plots and no other current designations for the land. The eastern boundary should follow the watershed boundary between the Sagavanirktok River and the lake district east of the Kuparuk River.</p>

The Toolik RNA should be expanded to include study plots at the Imnavait Creek materials site, these are a key comparison to those closer to Toolik Lake that allow researchers to discern what differences are due to soils and vegetation (which contrast at those sites), but have very similar climatic conditions.
The present boundaries of the Toolik RNA should be extended on the west, northwest, and south, sides, to include (a) at least the entire upper watershed of the Toolik River and Oksrukuyik Creek including all of its headwater lakes, and (b) at least a portion of the dune and heath habitats near the Atigun River crossing. These areas are already being used in long-term studies by investigators based at Toolik Field Station, and researchers are running out of space closer to Toolik Lake.
The Toolik Field Station has become the flagship Arctic field research station in the U.S. Researchers and students from a wide range of disciplines come from around the world come to work and study here. The location of the field station provides easy access to a wide range of environments that are representative of other places in the Arctic and the facilities and services offered allow a wider range of research to be conducted than has ever been the case previously. Much of the research that is being done is either explicitly of a long-term nature or could serve as a crucial benchmark for future studies if the local environment is preserved.
The Central Yukon Management Plan needs to recognize the importance of continuous long-term data collection to proper understanding and management of this unique area. The Toolik RNA supports such long-term research.
Material sites should not be enlarged into the Toolik RNA. Any enlargement of the Imnavait Creek material site could damage ongoing studies, some of which have been in place since the installation of the Dalton Highway in the 1970s.
The Toolik RNA should be maintained and the area protected to allow research to continue.
The BLM should renew the University of Alaska Toolik Field Station lease.
The use off off-road vehicles should be restricted within the Toolik RNA.
The BLM should continue with efforts to “pre-screen” areas within the RNA for research. Regulations about the degree and area of impact involved in triggering a requirement for a research permit within the RNA, and regulations about the number of separate permits required for a single project working at multiple locations, should be reformulated at least for research that takes place within the RNA. Many scientists engaged in research at Toolik, and particularly graduate students, often would like to set up new experiments relatively quickly based on observations made in the field. The current BLM permitting process requires a great deal of time for review, and has hampered research progress in the past. Streamlining the permitting process will allow new research to proceed more efficiently.
The current BLM regulations governing use of the Toolik RNA work well, allowing compatible non-research activities such as hunting, fishing and hiking. Given the huge investment in research and the sensitive nature of the long-term studies, we urge that non-research uses continue to be restricted to those that are temporary and non-invasive. Similar restrictions should be applied to the expanded RNA if it is approved.
ACEC nominations should not be done through a separate "call for nominations." The identification of new ACECs should be a product of the BLM's integrated planning effort following detailed resource inventories, data review, and analysis. The plan should identify all of the resources in the area being considered for ACEC designation and determine if the ACEC designation is appropriate to achieve the management objectives for the specific area. The planning effort should not start out by pre-determining that certain areas deserve a higher level of protection before management objectives have been established. The Relevance and Importance criteria, which must be met to qualify for ACEC designation should be reviewed in light of the resources of the entire planning area and not as individual areas. This review can only be adequately performed after the completion of planning related inventories and data review, including mineral inventories and assessments.
Requesting nominations for new ACECs early in the planning process compromises BLM's mandates to provide for a full range of multiple use opportunities on public lands and biases the process towards further land use restrictions and closures.

<p>The BLM's May 1, 2014 Call for Nominations and related press release inaccurately describe the current step in the process as the request was only for "nominations" for ACECs. As part of any nomination process, the BLM should also request comments on existing ACECs. Revised ACEC designations need to reflect new knowledge about resources values, and consider changes to laws and regulations regarding mining and other land uses that have occurred since the existing plans were developed.</p>
<p>There are significant inconsistencies in the BLM's approach to ACEC and RNA designations between plans. Some recent BLM plans use a very conservative approach when delineating ACECs while others do not. For example, the East Alaska and Bay RMPs designated only one ACEC each. Conversely, the existing Central Yukon plan designated 24 ACECs and RNAs, covering almost half the planning area. It does not appear that the environmental resources within the Central Yukon Planning Area are correspondingly that more "critical" or significant than those found in other planning areas. Rather it appears this is due to a lack of consistent criteria used in different planning areas, by different planning staff, and the relatively ambiguous criteria for ACEC designation. Another example is the designation of thirteen ACECs for fisheries and five ACECs for salt licks within the Central Yukon planning area. Many other BLM-managed lands have similar fisheries values and salt licks; yet statewide the BLM has identified ACECs for fisheries in only four other areas (three in Kobuk-Seward RMP and one in the Southwest Management Framework Plan (Anvik River), and no ACECs for salt licks. The BLM has apparently concluded that on BLM-managed lands outside the Central Yukon plan area, existing regulations provide adequate protection for these resources.</p>
<p>The guidance provided in BLM Manual 1613 is too vague, open ended, and broad, resulting in a inconsistent approach to ACEC designation between planning areas. Based on this guidance, it appears that many of the Central Yukon ACECs do not meet the importance criteria as many of the streams designated seem to be important locally, but not on a regional or statewide basis.</p>
<p>The RMP should encourage multiple use, emphasize that mineral development under today's regulations can be performed in an environmentally safe manner (as demonstrated by Taiga Mining Company operations for the past 24 years), and only propose ACEC or RNA designation in areas that clearly require a higher level of protection than provided by existing regulations. The re-write of the 43 CFR 3809 Regulations in 2001, along with new requirements from other agencies such as Alaska's Title 16 Authorities protecting salmon, and tightened water quality standards have put many new stringent requirements on Alaskan miners today. The protection these new standards provide, such as stream buffers and stream reclamation, should be considered prior to ACEC designation.</p>
<p>The following ACECs were established primarily for fish habitat protection. Considering the existing federal and State authorities that protect fisheries these ACECs should not be designated in the updated Central Yukon RMP, or the BLM must explicitly state why existing protections do not adequately protect these areas and why their fisheries resources are particularly unique: Gisasa River ACEC, Hogatza River ACEC, Indian River ACEC, Inglutalik River ACEC, Kateel River ACEC, North River ACEC, Shaktoolik River ACEC, Sulukna River ACEC, Tozitna River ACEC, Ungalik River ACEC, Jim River ACEC, Ivishak River ACEC.</p>
<p>Land transfers under the Statehood Act and the Alaska Native Claims Settlement Act have significantly reduced the land area under BLM management of many ACECs, making them no longer appropriate for ACEC designation. As many as 10 of the 25 ACECs in the planning area have had significant reductions in the acreage of land managed by the BLM. Where significant portions of the ACEC are no longer under BLM jurisdiction, the ACEC designations no longer apply and should be eliminated or, if ACEC designation of the remaining BLM-managed lands is determined appropriate, it should be reduced to only those areas remaining under exclusive BLM control.</p>
<p>Approximately 90 percent of the Hogatza ACEC has been conveyed and is now managed by the State of Alaska or ANCSA corporations. The BLM should consider dropping the Hogatza ACEC.</p>
<p>The BLM should not encumber the land with protective designations on lands they do not administer, even if the ACEC has no legal authority over the non-federal lands.</p>
<p>Prior land management plans called for leaving many ACECs open to mineral location. However, the BLM has kept many of these areas closed. Mining can be compatible with most ACEC designations and ACEC lands should be open to mineral location and entry under federal mining laws and to the sale of federally owned minerals, including oil and gas and coal resources. If the BLM finds it appropriate to maintain some of the existing ACECs or designate new ones, leaving them open to mineral entry with reasonable environmental protections can reduce the economic impact of designation.</p>

<p>All ACECs should be reviewed with consideration given to federal lands already designated as Conservation System Units under the ANILCA. Within the boundary of the planning area there are three National Wildlife Refuges representing a significant acreage. The area borders four additional National Wildlife Refuges and two National Parks all removed from multiple use management. These conservation system units represent many different types of ecosystems and resources of interior Alaska. These resources should be considered prior to establishing new, or maintaining existing, ACECs.</p>
<p>Discussion and proposed management of ACECs should not consider mineral resource development a “threat.” The BLM is charged by the FLPMA with managing federal public lands for multiple use, including specifically mineral resources. References to mineral resources within the existing planning documents repeatedly refer to mineral resource potential as a “concern” or a “threat” to their intended management. This language is found primarily in the five step-down management plans prepared by the Kobuk District between 1988 and 1995 for specific ACECs. Multiple use management requires that the BLM allow for access to mineral resources and opportunities for future mineral development, mining related activities should not be viewed as a “threat” to other resources.</p>
<p>The 1994 BLM Hogatza ACEC Aquatic Habitat Management Plan is no longer a relevant assessment or justification of the Hogatza ACEC: The maps are out of date with regard to the lode mining potential; the plan does not discuss modern placer mining techniques and safeguards; the aquatic habitat evaluation is based on out of date and incomplete information without regard to new mining techniques and safeguards; the ACEC location information is unclear; and 90 percent of the land is selected for conveyance or is no longer under BLM management.</p>
<p>The Hogatza area land status maps provided by the BLM show conflicting ACEC boundaries. The May 1994 BLM Hogatza ACEC Aquatic Habitat Management Plan maps indicates the ACEC abuts the entire east edge to the Doyon land; whereas the 2013 BLM GIS map layer indicates a gap in the Dry Creek area between the ACEC and the Doyon Land.</p>
<p>An incomplete chum salmon survey and poor spawning count timing has resulted in inaccurate assessment of the salmon in the Hogatza River system.</p>
<p>Mineral potential in the Hogatza ACEC area should be considered when reevaluating this ACEC. For example, there is potential for uranium, lode gold, silver, and rare earth minerals. Additionally, there is potential for a gold-copper-molybdenum porphyry system west of the ACEC. Native corporation lands in the area are available for mineral exploration and development. Taiga Mining is a large, highly regarding placer mining company which received an award from the BLM for their outstanding reclamation at Hogatza. In spite of Taiga’s diligent reclamation work the ACEC closures effectively prohibit Taiga Mining from staking additional placer claims.</p>
<p>Regarding the Tozitna Subunits, Kanuti Hot Springs, Indian Mountain, and Upper Jim River ACECs and the Spooky Valley and Ishtalitna RNAs: Acreage totals provided in documents provided by the BLM are vague and conflicting, representing boundaries that have varied over the past 25 years; Maps are of poor quality; and there are mixed and confusing references to ACECs and RNAs.</p>
<p>Much of the Tozitna Sub-units and the Jim River area are in conflict with State of Alaska land selections or top-filings where land status is unresolved. The State land interest includes most of the Ray Mountains and the adjacent pipeline corridor where selections have been top-filed over temporary BLM-managed land closures (PLOs) of the corridor. The State has filed land selections, or has top-filed selections over most of these lands in good faith that the lands will be re-opened to selection as per the intent of the Statehood Act. The area of State selection applications are largely due to mineral resource potential of the region, and the strategic importance of the only available corridor to the Arctic. In spite of a 2006 report to Congress on the status of existing PLOs that are blocking State selection, the BLM has taken no action to remove these closures.</p>
<p>Mineral potential should be considered when reevaluating the Indian River ACEC. Little modern information is available for the region although occurrences of zinc, copper, lead and gold have been reported. Modern exploration has been discouraged by restrictive military access and withdrawals for Native land selections. Indian Mountain is cored by an intrusive pluton that is generally grouped with the Hogatza Plutonic Belt which elsewhere is known to contain these metals plus uranium and rare earth elements.</p>

<p>Mineral potential and existing mining claims should be considered when reevaluating the Tozitna-Ray Mountains region ACECs. The intent of the State of Alaska to acquire lands in this region has encouraged the location of several thousand mining claims, the majority staked under the State mining location rules for location on State-selected lands. Multiple studies by Alaska Geological Survey, U.S. Bureau of Mines, and the U.S. Geological Survey indicate mineral potential across this region, including documented occurrences of rare earth elements, tin, tungsten, zirconium, chromium, germanium, manganese, and uranium. Mineral occurrences and exploration potential occurs as an approximately 50 mile-wide northeast-trending zone from the Kokrine Hills on the southwest, and including the Tozitna River, the Ray Mountains, Ishtalitna, Kanuti, Kilolitna, Ray, Salt, and Dall drainages, and ultimately beyond Caribou Mountain to the northeast including the pipeline corridor, the Jim River and upper Prospect Creek regions. The area of State selection applications and top-filings approximates the distribution of critical metals in statewide surveys by the National Uranium Resource Evaluation of the 1970s and 1980s. Dysprosium is one of the rare earth elements and is also one of the most sought after high-technology. The distribution of dysprosium correlates with the area of mineral potential across the Tozitna subunit. Similar patterns of distribution occurs for each of the other rare earth elements and associated metals such as tin and tungsten. Known deposits of chromium occur in a parallel adjoining belt forming the northwest side of the Ruby batholith trend. Generally in this area of central Alaska there are numerous perspective mineral locations that would be of interest to industry if questions of secure mineral title are resolved.</p>
<p>The Dulbi-Kaiyuh, Galena Mountain, and Sagwon Bluffs ACECs were designated to protect peregrine falcon habitat. Peregrine falcons were de-listed in August 1999. These areas should be re-evaluated.</p>
<p>Prior to considering new ACECs the BLM should review all existing ACECs to determine if they meet the relevance and importance criteria and if designation is still justified. Of the 25 existing ACECs within the planning area only seven have ACEC management plans. If only seven of these 25 ACECs required preparation of their own management plans, it is questionable if the areas actually meet the Relevance and Importance criteria.</p>
<p>The costs to the government of ACEC management should be considered when reviewing existing and new ACECs. ACEC designation can have serious budget implications for the BLM and result in agency directed mandates that are expensive and may not be met. The BLM prepared the Hogatza ACEC Aquatic Management Plan and subsequently embarked on a very intensive aquatic and hydrologic inventory and monitoring scheme spanning 15 to 18 years. While this work was likely undertaken to meet the objectives of the management plan, no reports, data summaries, or ACEC status reports were ever made available to Taiga Mining. To our knowledge reports of this nature were never prepared, including the annual reporting required under the management plan. Consequently, it is questionable if these undocumented data collection efforts were an appropriate expenditure of federal tax dollars.</p>
<p>Consider establishing a RNA near Lake Minchumina as there have been researchers coming there to do water resource research, air quality research and methane research.</p>
<p>The RMP should explain the usage for the Box River Treeline RNA and the data from the research done there. The RNA is a place that could be used to document changes due to climate change.</p>
<p>If the Toolik Lake Research Natural Area receives more land, it would prohibit access for subsistence activities. Toolik is the only place where you find caribou. People in Stevens Village would not want to lose access to those lands.</p>
<p>The RNAs (and ACECs) near the Tozi are doing what they were designated to do and should be left in place in the new RMP. The Tozi should not be a wild and scenic river because it would draw attention to the area and defeat the purpose of keeping it as habitat. Just keep managing it as you have for the past 20 years.</p>
<p>The RMP should evaluate the potential impacts of granting more land to the Toolik RNA and how this would impact nearby recreation or subsistence activities and access to the caribou hunting in this area.</p>
<p>The public commented about the beauty of the RNAs at Toolik and Galbraith Lake areas and the importance of their research uses; they should continue to be RNAs and not be further degraded.</p>
<p>The BLM should explain that the public and tribes can propose an ACEC through the planning process because areas are important special places, culturally valued, critical for subsistence, historic, or special biological habitats. Commenters noted that ACECs in the planning area are working and being managed well and that they can be expanded with input from the public and tribes to achieve their purposes.</p>

ACECs in the Utility Corridor that are small should be retained and expanded if possible.
If an ACEC achieved the purpose it was established for, it may no longer be needed (for example, protecting a species that is no longer protected by legislation).
The RMP should explain what a Research Natural Area (RNA) is and how they are designated and used.
<p>During scoping, the following areas were mentioned as areas with potential as ACECs:</p> <ul style="list-style-type: none"> • Gisasa River for salmon spawning and sheefish; • Kateel River for salmon and bears; • Central Arctic Management Area for species like wolves and sheep; • Hinshaw Creek near the Allakaket River for salmon and sheefish spawning areas; • The Nulato Hills for the Western Arctic Caribou Herd and muskox.
<p>The BLM needs to manage access issues on ACECs. Some lands users are unaware that an area is an ACEC and use Argos/ATVs/ORVs in critical spawning areas. The RMP should describe and evaluate access issues and implications of misuse.</p>
WILDERNESS, WILDERNESS STUDY, AND WILDERNESS CHARACTERISTICS
The BLM should ensure that the wilderness values of CAMA WSA lands are maintained until Congress acts on the Wilderness recommendation by managing these lands to retain their suitability as wilderness. They should remain closed to mineral entry and location, and no industrial activities should be permitted.
It would be inappropriate for the BLM to evaluate management scenarios in the RMP on how to manage the CAMA WSA lands “if Congress releases them from wilderness consideration.” The CAMA WSA is in place and bound by management objectives to retain its suitability as wilderness. Such evaluation of management in advance of Congress taking action would undermine the current status as recommended wilderness for the WSA and would be counter to current law and BLM policy.
The BLM should not approve State selection of any lands adjacent to the Nigu River corridor wilderness that was added to the Noatak National Preserve. The blocks of land on both sides of this corridor should be retained by the BLM, managed as wilderness study area, and eventually added to the Noatak National Preserve.
The block of CAMA lands that almost touches the Killik River, and is adjacent to the ASRC lands north of the Gates of the Arctic NP boundary, should also be retained by the BLM and continue to be managed as a CAMA WSA. These BLM-managed lands drain down into the Killik, just above Sunday Rapids. Drilling rigs and other infrastructure would be very unsightly for visitors floating out of the park and down the Killik to the Colville River junction.
Information presented in scoping indicates that the BLM only anticipates retaining 135,000 acres of the 260,000 acre CAMA WSA. The BLM needs to develop a full range of alternatives for the Draft RMP/EIS. This should include an alternative that retains all 260,000 acres in a Wilderness Study Area.
The BLM must provide rationale for removing any lands from a previously established Wilderness Study Area as well as indicate how the wilderness characteristics of these lands will be protected.
ANILCA Section 1320 specifically exempts BLM-managed lands in Alaska from FLPMA Section 603. As a result, the BLM is not allowed to manage lands recommended for wilderness designation to the non-impairment standard and is instead directed to manage in accordance with applicable land use plans.
All the lands in the CAMA WSA should be closed to mining entry and mineral leasing and retained in federal ownership. No State lands selection should be allowed in these blocks.
The RMP should evaluate current CAMA WSA and determine if it should be enlarged. Specifically, it was recommended that the Nigu Block suitable area should be enlarged and that the CAMA wilderness study area is important to maintain and protect to have a long-term understanding of how the natural cycles work in that area.

There should be no more wilderness areas considered in the RMP. There are enough in the state within conservation system units (CSUs).
The BLM needs to clarify to whether passage of a RMP results in the designation of wilderness or in a formal recommendation to Congress to designate wilderness areas.
The BLM must consider factors that may affect manageability of lands with wilderness characteristics including land status, mineral ownership, valid existing rights, needs for access to non-Federal inholdings, and additional statutory requirements. 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 for maintenance of wilderness characteristics. Much of this land area consists of Doyon-selected lands that are likely to be conveyed to Doyon during the term of the RMP, limiting the BLM's ability to protect wilderness characteristics 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 the BLM's ability to effectively manage the lands to protect their wilderness characteristics. Accordingly, proposals to designate areas in the vicinity of Doyon-owned or selected lands as areas where wilderness characteristics would be maintained are unlikely to be supported by BLM guidance governing the consideration of lands with wilderness characteristics in land use planning.
Within lands managed for wilderness characteristics, construction of new structures and facilities should only be permitted if needed for preservation or enhancement of wilderness characteristics or necessary for the management of other permitted uses. Construction of new roads should be prohibited.
The BLM must not apply management prescriptions to lands with wilderness characteristics (outside the Nigu River area in CAMA) which would equate with the non-impairment standard in FLPMA Section 603, thus conflicting with ANILCA Section 1320. The BLM should also not apply management prescriptions which would result in lands being managed more restrictively than ANILCA conservation system units. This includes any actions that would effectively result in a land withdrawal, which without subsequent Congressional approval would violate ANILCA Section 1326(a).
Much of the land in the planning area has wilderness-like qualities and no special designation is needed to retain such qualities.
Doyon, Limited 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.
Nationally and globally, we rapidly are losing wildlands and the irreplaceable, unsubstitutable values inherent in these necessarily large and contiguous blocks of land where natural processes prevail: intact ecosystems; diverse wildlife including predators and iconic natural phenomena such as migrations of huge caribou herds; clean free-flowing rivers; vast roadless areas, and solitude. These qualities permit important human activities—such as hunting, fishing, and trapping; remote and rural living; continuance of Alaska Native subsistence culture; wilderness recreation—and sentiments, such as a widespread passion for images of a wild Alaska and an enduring American Frontier. There is no question that, by an overwhelming majority, Americans favor conservation management in Alaska. Public lands in Alaska offer our nation a unique opportunity to avoid mistakes made in our 49 sister states, where wildlands have been replaced by strongly altered and managed landscapes and once abundant natural resources have been squandered relatively quickly and profligately. It would be an unnecessary tragedy to allow public lands in Alaska to be altered and exploited for short term gain by relatively few individuals and corporations, when instead these lands can be managed for sustained benefits and careful, well-regulated resource extraction that maximizes value to the public while minimizing resource damage and throughput.
Given that the majority of federal lands in Alaska contain wilderness characteristics as described in the BLM Manual, implementing restrictive measures to protect lands with wilderness characteristics could result in a continual erosion of available multiple use lands and potentially lead to wholesale limits on uses and activities in vast areas of the State. This would threaten the delicate balance regarding the designation of public lands achieved through ANILCA, as indicated in Section 101(d).

The BLM should recognize that the qualities of remoteness and pristine de facto wilderness that exist across much of the planning area are becoming ever more rare and therefore valuable nationally and internationally as lands with similar qualities continue to be degraded in the lower 48 and around the globe.
The BLM should inventory the planning area to document important wilderness qualities and publicly disclose the location, qualities, and decision rationale for the management of lands with wilderness characteristics prior to publication of the Draft RMP/EIS. Also offer the strongest possible protections for lands with wilderness characteristics.
The RMP must identify protections and means to preserve wilderness characteristics defined as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. We understand that current management prescribes that no wilderness designations can be made – but we consider this a whim of administrative priorities and have seen a record of back and forth closing and opening for review and designation. In light of this, lands with wilderness characteristics should be documented with goals for protection to prevent degradation that would preclude future designations.
Inventorying lands with wilderness characteristics will provide important data on large blocks of habitat and how the BLM can restore these blocks of habitat to better match the historic range of variability. Managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability is the most scientifically defensible way to meet society's objective of sustaining habitat.
Some suggested areas for a wilderness inventory include: the upper Chandalar drainage, Kateel River, Gisasa River, Kanuti Kilolitna drainage, both the Jim River drainage and the South Fork Koyukuk drainage downstream of the Bettles Winter Road, and the Kanuti River downstream of the Dalton Highway “nonwilderness” boundary.
The RMP should identify the following activities as incompatible with maintenance of wilderness characteristics: all forms of mineral leasing; summer use of off-road vehicles off of existing or designated trails; future development of extensive recreation facilities; and uplands adjacent to navigable rivers managed by the State of Alaska.
The sights and sounds of motorized use are not consistent with naturalness and solitude, both key qualities of lands with wilderness characteristics. Although motorboat uses for subsistence purposes would need to be addressed, use of high-performance jetboats, airboats, jet skis and hovercraft are not included in ANILCA motorboat provisions and are of concern in areas managed for wilderness characteristics. Impacts due to motorboat use include increased bank erosion as seen in the Fortymile River. A wake control mechanism should be required for motorboat use should only be permitted in these areas.
Mining is inconsistent with protecting wilderness characteristics. Most of the lands identified with wilderness characteristics do not have high potential for mineral development and the BLM has not provided any justification for permitting it. At a minimum, lands with wilderness characteristics that overlap ACECs, headwaters and rivers, and important habitat should be closed to locatable mineral location and entry. The RMP could provide for permitting such activities based upon evidence by an applicant of high resource potential and that there are not comparable resources outside of lands being managed for wilderness characteristics.
Airplane use in lands managed for wilderness characteristics should be limited to only primitive, unimproved landing areas, or any existing areas that are already improved. Commercial helicopter use should be prohibited. The RMP should allow for landing strip improvement only if there is a compelling reason why an unimproved landing area is not sufficient and all efforts are made to minimize impacts to wilderness characteristics.
The Noatak [sic] River is considered the wildest river in the world by the United Nations and used as a reference point for judging other rivers. The land around [Lake] Minchumina could also be such a necessary reference point to judge how the rest of Alaska's wilderness measures up. We do not seem to have rare minerals or oil and such that is sought after by profit seekers. What we do have is priceless. An undesignated area of relatively unexplored square miles that can be traversed on foot without fences, barbwire or No Trespassing signs. It is an area of intense alders and willows and mosquitoes. No permit is needed to wander and if you did not return, no one could find you very easily. Why then can't we have an undesignated area that is for the future? Those that use this area have to uphold the pristine wilderness

The BLM is implementing portions of Secretarial Order 3310 as represented in BLM Instruction Manual 2011-154 to administratively identify and subsequently protect lands with wilderness characteristics through the land use planning process. While the BLM does not call the action a wilderness review, the basis for the policy is the Wilderness Act. By protecting lands with wilderness characteristics through land use planning, the policy is circumventing congressional direction in ANILCA Section 1320 to continue multiple use management on recommended lands pending any action from Congress.
The BLM should provide a range of alternatives regarding the protection of lands with wilderness characteristics, including an alternative that protects all identified lands.
Wilderness characteristics should be retained on the largest possible area to maximize the long-term value of the area for wildlife, subsistence, aesthetics, ecosystem services and resilience against climate change.
Opposition to managing lands with wilderness characteristics should not deter the BLM from fulfilling its responsibilities to undergo this important assessment.
The BLM should apply strong management prescriptions that will retain wilderness qualities for lands chosen for protection of wilderness characteristics.
The BLM should recognize the wide range of values associated with lands with wilderness characteristics including: scenic, recreation, wildlife habitat, riparian, economic benefits, and quality of life. The Federal Land Policy and Management Act (43 USC § 1711(a)) specifically identifies scenery, outdoor recreation, and wildlife habitat as resources to be inventoried and managed by the BLM. Lands with wilderness characteristics provide opportunities for primitive recreation, preserve the scenic viewsheds, and provide habitat for a variety of fish and wildlife. The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish and Wildlife Service, state residents and non-residents spent \$3.4 billion on wildlife recreation in Alaska in 2006. The wild lands within the planning area help define the character of this area and are an important component of the quality of life for local residents and future generations, providing wilderness values in proximity to growing population centers.
FLPMA recognizes that “multiple use” of the public lands requires “a combination of balanced and diverse resource uses” that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 USC § 1702(c)). FLPMA also requires the BLM to prepare land use plans that may limit certain uses in some areas (43 USC § 1712). Many other multiple uses of public lands are compatible with protection of wilderness characteristics – in fact, many uses are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM-managed lands, while other more exclusionary uses (such as energy development) will still have adequate opportunities on other BLM-managed lands in the planning area.
The RMP should consider an alternative that would include all lands with wilderness characteristics in one or more wilderness study areas.
The upper Nigu River, situated between Gates of the Arctic Park and Noatak National Preserve should be designated as wilderness and managed to preserve wilderness character in the interim. North Slope rivers in the central and western Arctic—distinctively different than those in the Arctic National Wildlife Refuge to the east—are poorly represented in federal wilderness lands. Only the upper Killik is well protected. This makes the Nigu WSA particularly important as wilderness.
The BLM does not have the authority to create de-facto wilderness. It is critical that the agency differentiate between the powers of rule promulgating and enforcement agencies (the BLM and Forest Service) and our federal rule making body (Congress). Rule-making agencies cannot create areas that are wilderness in all but name. Wilderness study areas and non-motorized areas are managed as wilderness areas and are simply a mechanism to evade the measures set forth in the Wilderness Act.
Designation as wilderness is out of touch with the needs of the public because recreation is not a stated purpose of the Wilderness Act and, therefore, recreation in wilderness area can not and should not be emphasized. Recreation is a stated purpose in the multiple use laws and, therefore, should be emphasized in the RMP.

Overall public opinion is that an adequate amount of our wilderness areas are protected under current conditions (http://www.costcoconnection.com/connection/200901/?u1=textureity).
Over 50 percent of the public land is managed as wilderness, wilderness study area, national park, roadless, non-motorized area, wildlife management, or other restrictive management criteria that eliminates most or all motorized access and motorized recreation. Continued motorized use of existing routes should be allowed in inventoried roadless and wilderness study areas until congress approves the area as wilderness. The courts have already established this precedent as supported in Judge Molloy's ruling in 2001 on the Montana Wilderness Study Act and the Big Snowy Mountains travel plan which was upheld in 2006.
With regard to wilderness areas, roadless areas, national recreation areas, natural landmarks and monuments, and wild, scenic, and recreational rivers, the BLM is only authorized to delineate such areas and report such findings to Congress. Unless and until Congress actually designates such areas under applicable law, such delineations should have no effect on the multiple use and sustained yield mandates for management of public lands.
There is value in solitude. There are, however, many acres of wilderness, non-motorized, and exclusive-use areas available to provide solitude. meanwhile, the amount of multiple use lands is diminishing. Managing multiple use lands by wilderness criteria and for perfect solitude does not meet the communal needs of the public and is not a reasonable goal.
Managing lands to protect wilderness characteristics will also help protect cultural and archaeological sites.
The BLM should increase protections from development in wilderness study areas including: consideration for improving operations standards concurrent with improvements in technology, closures and limitations.
The RMP should explain wilderness characteristics and how it applies to lands in the study area. The BLM should research if the Dalton Highway meets the criteria for wilderness characteristics.
WILD AND SCENIC RIVERS
The Unalakleet Wild River needs to be managed to support the wild fisheries. Further, the tributaries not designated under the Wild and Scenic River listing also need to be managed to protect the salmon and varying fish species spawning and essential habitat areas.
The BLM should look at the possibility of trading BLM-managed land elsewhere for State-owned land on the Alatna and John Rivers which could be considered for designation as Wild and Scenic Rivers, extending protection of these rivers beyond the Gates of the Arctic National Park.
Consider the Atigun River for eligibility for designation as a Wild and Scenic River. Arctic National Wildlife Refuge lands in the Atigun River Gorge have been assessed and evaluated through a formal Wild and Scenic River review process for Arctic Refuge's Draft Revised Comprehensive Conservation Plan (USFWS 2011) and found to be eligible and suitable for recommendation as a Wild River with Outstanding Remarkable Values for recreation and geology. BLM-managed lands in the Atigun River drainage provide for very high quality recreational experiences and have outstanding values for scenic, geologic, wildlife and cultural resources. Several sites in the Galbraith Lake vicinity have been nominated to the National Register. The Atigun sites contain much cultural material that could be significant in unraveling the prehistory of Native Alaskans occupation of the North Slope. The geology and paleontology in the area are remarkable and accessible via the Dalton Highway. Atigun Pass leading into the Atigun River Drainage is described as having high scenic values.
The provisions in ANILCA that apply to conservation system units would apply to any new rivers designated by Congress, such as allowing motorized access pursuant to Section 1110(a) and (b), and the Title XI TUS process. Any interim management prescriptions applied to rivers identified as suitable for recommendation to protect outstandingly remarkable values cannot be more restrictive than the provisions that would apply to congressionally designated wild and scenic rivers.
It is very important during the Wild and Scenic river evaluation process that the BLM work closely with local communities to explain what a Wild and Scenic River designation means for protection and how it does not inhibit the ability of local people to participate in subsistence, and traditional and customary practices.

Whether found suitable or not, all segments found eligible must, under the provisions of the Wild and Scenic Rivers Act and accompanying regulations, be managed in order to preserve the characteristics that make those segments eligible.
The blocks of BLM-managed land where the Etivluk River runs into the Colville River, and also down Colville on the south bank, should be retained by the BLM and continue to be managed as the CAMA WSA. These lands should be considered for inclusion under the Wild and Scenic River System, along with other BLM-managed lands within the National Petroleum Reserve Alaska, from the headwaters of the Colville to at least Umiat. All this block should be closed to mineral entry and remain closed to mineral leasing.
The BLM should have the following goals for proposed and designated Wild and Scenic Rivers: 1) Conduct and/or continue reclamation activities of historic and current damages from development and mining; 2) Prevent damage to WSRs by prohibiting stream diversion and enforcing reclamation standards for all existing and future mineral operations; 3) Strictly manage placer mining and water quality standards to maintain outstandingly remarkable values; 4) Maintain water quality standards consistent with efforts to restore salmon populations on the Yukon River and its tributaries.
National designations such as National Wild and Scenic River or Wilderness Study Areas may restrict or eliminate research activities that are vital to our understanding of these environments. Such designations should not be sought if they will restrict or eliminate future environmental research activities. Specifically in Kuparuk River, Innavaik Creek, and Ksrukuyik Creek above the downstream point at which they cross BLM-managed lands.
The Jim River along the haul road should be considered for Wild and Scenic River status. It is close to the highway and offers roadside access and egress. Below Prospect Creek, it has a pretty section through a scenic canyon with a six mile line up the South Fork of the Koyukuk to the Bettles Road.
The Kanuti Kilolitna River, and the Kanuti River downstream of the Dalton Highway, Jim River, and Melozitna River should be evaluated for eligibility and suitability as Wild and Scenic Rivers. Rationale: 1) they exemplify the words "Wild" and "Scenic", 2) there is no/little nearby human development, 3) they have adjacent, heretofore undescribed, relic Beringia veg. communities, 4) they have adjacent old growth spruce/lichen habitats (a habitat type that is declining in the landscape), 5) there are scenic and unusual granite tors along the river (Kanuti Kilolitna River), and 6) they host nesting golden eagles (BLM Sensitive Species).
That portion of the Killik River flowing north from the Gates of the Arctic Park, all the way to the Colville River, through State and Arctic Slope Regional Native lands should be considered for possible addition to the Wild and Scenic Rivers System.
When considering river suitability, a study must consider the potential land ownership pattern following completion of State and Native land conveyances. Highly fragmented land ownership does not lend itself to wild and scenic river corridor management.
Whatever the ultimate collection of stream segments found to be suitable for designation [as Wild and Scenic], the BLM should consider the following management options for protecting each segment and apply those that are necessary for adequate protection: 1) withdrawal from mineral entry; 2) visual resource management class I or II; 3) designate as right-of-way exclusion areas; 4) ensure sensitive species habitat is maintained or enhanced through remedial actions; 5) subject to extensive and reliable no surface occupancy stipulations for all activities; 6) closed to oil and gas exploration and development; and 7) other appropriate measures.
The rivers running through the Nulato Hills, should be studied for Wild and Scenic River nominations. The BLM should consider the Nulato River for designation as wild and scenic. Residents in Nulato noted that the Nulato River should be a WSR as it is a place for spawning for sheefish as well as summer chum and fall chum, trail trout, lush fish (burbot) and everything that people depend upon in that area. In addition it was noted that they did not want to see any sport fishing or commercial fishing happening in an area because it is critical to them.
There are already enough National and Wild Scenic River Systems. We don't need any more.
There should be no more "Wild and Scenic River" designations in Alaska because they represent federal government overreach of their jurisdiction.

National Wild and Scenic River recommendation and designation imposes significant restrictions on the use of, and access to, surrounding lands. Recommendation and designation of additional river segments could prevent Doyon from reasonably accessing its lands and enjoying the full economic benefit of those lands as intended by ANCSA.
ANILCA added 26 rivers to the Wild and Scenic River System and mandated 12 additional rivers be studied for potential designation. The reports required in Section 604 for rivers designated for study have long been completed.
The BLM must disclose the scope of the outstandingly remarkable values (ORV) inventory process used in the eligibility report, and extend that analysis to include all stream related ORVs and study corridors wide enough to incorporate those ORVs. Some past wild and scenic river studies have relied too heavily and arbitrarily on a one-quarter-mile "buffer" around identified segments in its initial identification of ORVs. The BLM guidance is clear that such a "buffer" is not the appropriate measure for an ORVs association with a river. For example, ORVs can "owe their location or existence to the presence of the river" (IM 04-196), a standard on which it would be arbitrary for the BLM to place a numerical value. If the BLM uses this arbitrary buffer, the agency may overlook significant ORVs that are tied to a river segment.
Evaluate the following rivers for Wild and Scenic status: Nulato River, Tagagawik River, Gisasa River, Honhosa River, Kateel River, Dulbi River, Hogatza River, Tozitna River, Chitanana River, Nigu River. All of these rivers support important fish species and are free flowing. The rivers and their immediate environments must be protected for the benefit and enjoyment of the present and future generations.
The South Fork of the Koyukuk is a delightful stream, both up stream from the bridge and down stream. It should be considered for possible inclusion in the Wild and Scenic River system.
The RMP must carefully study all potentially eligible wild and scenic stream or river segments, adopt requirements to ensure eligible and suitable rivers are protected pending decisions on their designation, and ensure any designated rivers and river corridors are managed to preserve their values.
The Preparation Plan states that the BLM will rely in part on the public scoping process to identify outstandingly remarkable values for the rivers in the planning area, of which "all are free-flowing" (page 15). Presumably this means the BLM will be reviewing all rivers within the planning area and relying on scoping comments from advocacy groups and individuals for supporting information. A similar method was followed for the Wild and Scenic River study conducted for the National Petroleum Reserve-Alaska. This approach is inconsistent with BLM and interagency guidance that calls for a rigorous, well-documented study process conducted by agency staff. The BLM also should consider whether they have adequate funding and staffing for such extensive studies.
The Tozitna River should not be considered suitable for designation as a Wild and Scenic River. Just being named a Wild and Scenic River is an advertisement to an area most people have not heard about. Also it may limit the means transportation used historically on the river by the local people and the State of Alaska deems the Tozitna as a navigable stream.
The RMP should explain the implications for land management under WSR designation. The RMP should describe which rivers are currently designated WSR and how the WSR designation affects water rights to villages in areas with this designation.
Commenters in Allakaket asked if the Alatna River could be designated as a WSR since some parts of this river are through State lands. The BLM should explain the implications of WSR designation to hunting and potential planned road crossings to Ambler.
The Gisasa River should be kept Wild and Scenic. It's hard to access. It's swifter. It's not quite white water, but it's tough to navigate. Especially with USFWS controlling the lower part of it, it's really good to keep it accessible.
The designation of "Wild and Scenic Rivers" creates conflicts with mining activities and should not be allowed if there are mining claims nearby.
Commenters suggested rivers that could be nominated for WSR designation and asked the BLM to provide guidance on the process.
OTHER SPECIAL DESIGNATIONS OR GENERAL COMMENTS

The RMP should not designate any new Wild and Scenic Rivers, ACECs, lands managed for wilderness characteristics, or wilderness designation.
While the BLM apparently does not consider studies which are incorporated into resource management plans to be single purpose studies, the purpose of the Wild and Scenic review for Central Yukon is clearly stated in the Preparation Plan (page 15) as "Potential additions to the National Wild and Scenic Rivers system will be considered during this land use planning effort." In Alaska, such studies are in direct conflict with ANILCA Section 1326(b).
The BLM should recognize the spirit and the language of the great compromise that was effectuated with the passage of the ANILCA, upon which it was agreed by all parties that no additional lands would be studied for inclusion in the four land preservation systems (the National Park System, National Forest System, Wilderness System and Wild and Scenic Rivers System). The mandate of the BLM is to ensure that public domain lands are available for reasonably regulated multiple use where the limits on regulation do not conflict with health and safety of the general public. Setting aside public domain is beyond the scope of the Public Use mandate and barred by ANILCA Sections 101(b) and 1326 (a) and (b). Any determination by the BLM to preclude multiple use within portions of the study area, in the absence of specific language in ANILCA to the contrary, is prohibited.
ACECs, Wilderness Study Areas, National Parks and Preserves, Scenic Corridors, and Wild and Scenic River designations should be eliminated and some are overextended as they block access to lands. The State of Alaska and people of Alaska should be given these lands to manage with these fish and wildlife resources. As a result of the land selection process, the federal government has "locked up" the best lands and blocked access. For example, the ACEC Box River is correct for some parts of the area but viewed as overextended. In some ACECs, people are prevented from locating cabins near rivers, the logical place to stay. Land managers should identify and reevaluate which critical parts of an ACEC are truly necessary; a whole drainage may be established as an ACEC for salmon, but salmon don't use every creek in the drainage.
The BLM should not include the CAMA lands because it adds to the complexity of the plan needlessly. CAMA is pending congressional action for a good part of the lands.
If the RMP designates scenic byways, such designation would have no effect on multiple use and sustained yield mandates for management of public lands.
The following RNAs should be considered for designation as National Natural Landmarks: Arms Lake, Box River Treeline, South Todatonten Summit, Spooky Valley, Redlands Lake, McQuesten Creek and Lake Todatonten Pingos. There may also be other proposed or existing National Natural Landmarks elsewhere in the planning area that should be addressed by the plan.
The RMP should not be consistent with the Dalton Highway Scenic Byway Plan because it almost prohibits all future mining roads be attached to the haul road.
The BLM should take the sentiments of multiple stakeholders documented in the "Dalton Highway Scenic Byway Corridor Partnership Plan" into consideration during development of the RMP. This plan was developed by a very diverse group is an accurate representation of concerns and hopes from those that care about these lands the most. Also consider if the Dalton Highway should be considered for National Scenic Byway designation.
The BLM must coordinate any actions taken to designate or otherwise manage special designation lands with the State at all stages of planning. This is of particular importance if restrictions, such as seasonal closures or limits on visitor use days affect State lands, waters, or authorities, or if deviations from State land use plans are considered. Any area and/or corridor system designated for any special purpose should be selected with a high level of public support.
Because special management designations have the potential to impose additional limitations or management strategies on public lands, these designated areas should be delineated judiciously to balance public use with the protection of public resources. Proposed additions should be for the same purposes as the original special designation, with special attention paid to both relevance and importance criteria per 43 CFR 1610.7-2. Proposed designation, and or additions, should focus on the exact amount of land necessary to ensure the appropriate management status for specific resource management issues, encompassing the smallest area required for the underlying purpose of the designation. Special areas should be open to other resource users to the extent practicable that is compatible with the given designation.

If the RMP proposes limitations on allowable uses in specially designated areas (as opposed to deferring them to a step-down plan), the RMP/EIS should include a thorough analysis of the use and associated issues and concerns.
If subsequent planning or inventory activities are needed to support the proposed limitations in specially designated areas, the RMP should include a time frame for completion of the additional work.
All proposed special designations need to be identified, mapped and justified. The RMP should clearly state the management intention for each area and any additional restrictions that would apply.
The BLM should create management zones and consider layering of special administrative designations to conserve important habitats, as well as to achieve management goals and prescriptions. Because different administrative and congressional designations serve different purposes, and management is often limited to protect only those values relevant to each particular designation. For example, the fact that an ACEC may lie within a WSA does not justify failing to create the ACEC.

A.14. Subsistence and Traditional Ecological Knowledge

The BLM identified the following areas having subsistence interest, but not designated as withdrawn from mineral leasing in the 1986 Central Yukon RMP: Rodo River, Kateel River, South Fork Huslia River, Tagagawik River, Ray River and the three tributaries of the Squaw Creek (northwest of Rampart). Currently these areas have a 300-foot “no surface occupancy” setback zone along either side of the water course (measured from the mean high-water line or center line of the non-navigable water courses). The BLM must evaluate these areas for stronger protection to protect subsistence use areas and resources including vital fish and wildlife habitat.
Resource management decisions proposed in the RMP could impose significant limitations on access and activities that could adversely impact these customary and traditional uses. The 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.
The BLM needs to consider the impacts of climate change on subsistence resources and practices. For example: 1) Changes in terrestrial conditions may influence availability of wildlife and fish species to harvest, as well as access to harvest; 2) Changes in the seasonality of events such as river freeze-up and break-up may affect opportunities for customary and traditional uses of fish and wildlife; 3) Range extensions of more temperate plants and animals may affect subsistence resources; rural cultures and lifestyles may be threatened due to changes in subsistence opportunities, and 4) Economic losses to local subsistence communities may occur as traditional target stocks change in their relative abundance.
The BLM needs to consider the impacts of climate change on subsistence resources and practices. Changes in habitat within and beyond BLM-managed lands are predicted to stress all of the wildlife, waterfowl and fish populations that serve as subsistence resources. Some populations may increase in abundance while others may alter their migration and become unavailable. The BLM should consider protective management strategies for lands with wilderness characteristics and National Wild and Scenic River status as tools that can help wildlife populations adapt in a less disturbed environment during climate change while insuring subsistence access to needed resources.
Findings regarding changes due to climate change from State-based agencies should serve as ample warning of the potential impacts to the traditional way of life, not inclusive of direct impacts from development and other site-specific management prescriptions that could promote damage to subsistence resources. The BLM must work closely with local and State experts to prevent and minimize impacts to habitat and wildlife – and prioritize the existing uses of the region over new incompatible uses.
Both Alaska Natives and surrounding communities depend upon the bounty of the lands and waters for their livelihoods as commercial fisherman, and for subsistence, cultural and traditional practices. Development projects including mines, roads and associated infrastructure could pose significant negative impacts on surrounding communities, including water degradation and reduced access to subsistence resources.

The impact analysis in the EIS must include: current development projects near communities and how those projects impact the ability subsistence users to access subsistence resources; impacts of such development to physical health and social well-being; potential increases in outside hunter activity with the possibility of new road construction; and impacts to communities due to increased traffic from roads constructed for resource development.
Wildlife management and subsistence activities can be impacted by the fragmentation of the lands. These impacts should be evaluated to ensure the integrity of the land is maintained for subsistence which is a priority on federal lands.
Chinook and chum salmon are a vital subsistence resource for rural residents throughout the Yukon River. Without subsistence salmon to feed people and the sled dogs, which are an integral part of the subsistence lifestyle on the Yukon, existence in these remote villages would be difficult, if not impossible. Salmon are of irreplaceable value to the cultural, spiritual, and nutritional needs of the Native people of the Central Alaska region. Subsistence salmon literally serve as the “grocery store” for village residents, and also serve vital cultural purposes. In communities where other subsistence resources such as moose and caribou have decreased, the value of salmon as the only subsistence resource is even greater. Under the Alaska National Interest Lands Conservation Act (ANILCA), federally qualified subsistence uses have priority over other fish and wildlife needs in river.
Impacts to subsistence users should be analyzed on a Yukon River watershed-wide basis, as any impacts to the salmon in the Central Yukon region will be felt throughout the watershed. Because the Chinook salmon runs are not strong enough to support subsistence needs, particular concern should be given to protecting these stocks in the RMP.
Changes in the availability of subsistence resources has a profound impact on the sharing of resources from village to village. Throughout history, tribes in the Central Yukon have established a complex social network of sharing resources. Further impacts to the availability of resources will undoubtedly change the character for these networks and relationship between tribes throughout the region. (Magdanz and Utermohle, 2005)
The BLM should fully analyze effects on subsistence and consider alternatives to reduce or eliminate the need for the decision if the subsistence impact is negative.
The Alaska Native culture present in the planning area is one of the last intact, sustainable subsistence-based cultures in the world. Fish and wildlife are integral to this culture as subsistence food and as the foundation for their language, spirituality, and social structure. this connection has been maintained for at least The past 4,000 years and is in part due to and responsible for the continued pristine condition of the region’s landscape and biological resources. The respect and importance given salmon and other wildlife, along with the traditional knowledge of the environment, have produced a sustainable subsistence-based economy and way of life which is a key element of indigenous identity; this respect serves a wide range of economic, social, and cultural functions in Inupiat and Yu’pik societies.
About 270 communities in Alaska are classified as “rural” based on an annual per capita harvest about 153 to 664 pounds of wild food. Wild food harvest in rural Alaska contains about 242 percent of the protein and about 35 percent of the caloric requirements of the rural population. In comparison, in Alaska's non-rural areas wild food harvests ranges from about 16 to 40 pounds per capita annually and the urban harvest contains about 15 percent of the urban population's protein requirements and about 2 percent of the caloric requirements. The BLM, therefore, must evaluate these areas for stronger protection to protect subsistence use areas and habitat.
For Alaskans, preservation of a subsistence lifestyle, or subsistence activities such as hunting, are a primary reason to preserve much of the existing land character and fish and wildlife populations with as little human influenced change as possible.
The BLM must work with local communities and users of the area to gain the broadest and most comprehensive understanding available in order to maintain and protect subsistence resources and opportunities. Other BLM management plans have been passive stating remote locations automatically protect wildlife and resources. This approach does little to maintain and protect wildlife resources.
We value our land. We do not want to see outsiders using our lands natural resources at all.

As an Athabascan Native of this region, I protest your never ending quest to shut out all people from their “right” to the land and water. The interior people need your help to protect their land that you are trying to close off or restrict their access – These people were and still are here using the land.
Subsistence should be left alone.
The RMP must protect all subsistence resources, not just fish, fur and game habitats. Forests suitable for firewood and cabin logs should be set aside in areas where villages have customarily gone for these resources, and berry patches that are traditionally used year after year, and all the other numerous natural resources bush folks depend so heavily upon.
Development precludes wildlife as it fragments and eliminates habitat. Critical habitat of ample acreage must be prioritized for wildlife.
The cost of living has gone up considerably for communities throughout rural Alaska. Delivery of freight by air and barge is very expensive. It is certain that the associated costs will continue to rise as the price of fuel increases making subsistence increasingly important. The BLM must ensure that studies related to subsistence are comprehensive and that proper mitigation measures are in place to protect subsistence resources.
Based upon statewide research conducted largely in the 1990s, the average annual wild food harvest in rural areas of Alaska is estimated at 375 pounds per person compared to 22 pounds per person in urban areas of the state. Among rural Interior Alaska communities, ADFG Division of Subsistence estimates that the average annual wild food harvest is 613 pounds per person and that 69 percent of rural Interior households harvest wildlife and 88 percent of households use wildlife resources, attesting to the significance of sharing wild foods with other households in subsistence oriented communities. Similarly, 75 percent of rural Interior households harvest fish while 92 percent use fish for subsistence purposes (ADFG 2000).
Due to the significance of wild resource uses to the economies, cultures, and ways of life of Interior Alaska communities, the RMP must document and describe the customary and traditional wild resource use patterns in those communities located on or near BLM-managed lands and those that have a pattern of using those lands for subsistence purposes. These communities include, but are not limited to Alatna, Allakaket, Bettles, Coldfoot, Evansville, Galena, Hughes, Huslia, Kaltag, Koyukuk, Nulato, Rampart, Ruby, Tanana, and Wiseman.
One of the questions describing the subsistence issue in pre-planning documents is "How can the BLM protect resources that are important to maintaining a subsistence lifestyle?" This implies that resources are currently not protected or are being damaged. The more appropriate question for the RMP is: "Are subsistence resources being damaged and is additional protection needed?" This is a resource management concern, not solely a subsistence concern.
Changes in the availability of subsistence resources have a profound impact on the sharing of resources from village to village. Throughout history Central Yukon tribes have established a complex social network of sharing resources. Further impacts to the availability of resources will undoubtedly change the character for these networks and relationship between tribes throughout the region. (Magdanz and Utermohle 2005).
The RMP should include reference to BLM’s duty to protect instream flows for subsistence uses. Under Alaska National Interest Lands Conservation Act (ANILCA), the government reserved “water quality and necessary water quantity” for new national wildlife refuges, parks, and forests, covering approximately 104 million acres. With some exceptions ANILCA Section 810 imposes procedural restrictions on future dispositions of public lands if such dispositions will affect subsistence. If so, the federal agency managing the lands must analyze the effect of the disposition on subsistence and consider alternatives to reduce or eliminate the need for the disposition.
Transfer of federal public lands to the State eliminates the federal rural subsistence priority which generally provides more liberal seasons. Harvesters living within or using the transferred lands will have to compete for wild resources with all Alaskans. In some case there may be an island of State lands with State regulations surrounded by large tracks of federal lands. This State regulations island may result in citations, confusion, and additional cost to the harvester. The cost would come from traveling great distances to take advantage of less competitive federal seasons on distant federal lands. This loss and additional burden occurs without any development occurring.

Subsistence users have observed changed or diverted migration routes, reduced harvest of caribou, decreased size of caribou individuals and groups, and increased disease. The BLM should conduct a comprehensive assessment of the subsistence scenarios of migratory species coming through these planning areas.
The RMP should prioritize protection of subsistence resources as well as cultural and traditional practices of those people living in this area. The federal government has a 'trust responsibility to protect the hunting and fishing rights of Alaska's indigenous peoples (ANILCA Title VIII).
Healthy land and water provides health to the people. We ask the BLM to consider protecting the resources that nourish the fish, birds, and animals long into the future. Subsistence use and traditional customary practices are essential to residents of the planning area and should be the priority in land management decision making.
The undeveloped lands in the planning area help to define the character of this area and are an important component of the quality of life for local residents and future generations. Their protection enables the customs and cultures of these communities to be sustained.
With the exception of those necessary for State and ANCSA corporation conveyances, Section 810 of ANILCA imposes procedural restrictions on future dispositions (such as leases, permits, withdrawals) of public lands if such dispositions will effect subsistence. If so, the federal agency managing the lands must analyze the effect of the disposition on subsistence and consider alternatives to reduce or eliminate the need for the disposition. If the disposition would "significantly restrict subsistence uses," then it is prohibited until the agency: 1) gives notice to the State and the affected local committees and regional councils, 2) gives notice and holds a hearing near the lands being disposed of, and 3) determines essentially that restrictions of subsistence is necessary, that the least possible amount of land is affected and that reasonable steps will be taken to lessen adverse effects on subsistence.
The impacts over time and space are often inadequately weighted in section 810 analyses. The current approach trivializes the importance of wildlife habitat and the reliance on the yearly migration and movement patterns of wildlife. What federal and State agencies consider short term impacts – meaning wildlife is only displaced for a single season – can mean year-long impacts to subsistence users. Displacing wildlife, even for short time periods, could mean traveling farther for harvest or not harvesting at all. The awareness of subsistence practices (locations, timing, and value) is just the beginning of the BLM's obligation. Suppression or prohibition of activities in critical areas at vital times will ensure that multiple uses can coexist. Habitat is also undervalued in section 810 analyses. Reviews of harvest locations and migration patterns are not enough. A higher value must be placed on the large amount of habitat necessary to maintain healthy wildlife populations, which in turn will ensure healthy people.
The BLM must work with the tribes to develop a clear strategy for conducting section 810 hearings. The BLM commonly conducts section 810 hearings in conjunction with other meetings, but the meeting must clearly define objectives for attendees and segment discussions to allow for appropriate use of time and effective information sharing. This may mean contacting tribes in advance and establishing agenda that guide discussions and define the desired outcome. Information must be shared both ways between governments.
The BLM must take a more comprehensive approach to working with subsistence users throughout the region and develop a realistic model for information sharing that can be properly incorporated into the plan.
BLM-managed lands along the Chandalar River just upstream from Venetie is vital for subsistence. In addition to heavy fisheries subsistence use in the region, local residents of Venetie also rely on the upper Chandalar River corridor (East Fort to Caro, specifically elevated bluffs on the south side) to hunt moose and harvest furbearers. These bluffs have been used for generations and moose provide a significant source of protein for Venetie residents. Due to the historical use of this area, there are likely undocumented areas of cultural significance as well. Protection of water quality and subsistence resources in this area is very important. These lands should remain in federal ownership and not classified as open to mineral entry and leasing.
The BLM must work closely with the ADFG Subsistence Division, appropriate Native subsistence and comanagement organizations, and local residents to determine what additional assessment of subsistence and subsistence use areas may need to be undertaken to inform the Draft RMP/EIS.

It takes a large area to support the traditional subsistence user. My sister and I have roamed across up to 1,000 square miles to harvest furbearers, moose, fish, berries, herbs, firewood, cabin logs, poles, stones, sand, gravel, moss, bark and countless other supplies. Our dogs subsist largely on whitefish taken by gill nets set at several critical spots in the lake. Many of us travel 5-30 miles in search of berries and moose. Traplines can extend 20, 50, even 100 miles and many villages are surrounded by unprotected trapping areas claimed by individual trappers.
Given the terrible economic prospects and the crushing freight costs in the bush, traplines offer one of the few sources of income and need to be protected. The most valuable furbearers - wolf, marten, lynx and wolverine - do not adapt to encroaching humans, but retreat from areas of development. These wild animals, their habitat and the traplines that rely on this valuable renewable resource should be protected not just for their economic value but also for the simple value of their existence.
Top priorities for subsistence use on Kanuti National Wildlife Refuge and adjacent lands are: moose, caribou, bears; white-fronted geese; chinook, chum, and whitefish.
Many of the villages within the planning area have outdated community contemporary subsistence use studies. Some are over 30 years old. Resource availability and abundance has changed and possibly village demographics. Comprehensive community subsistence surveys need to be updated and communities without any need to have one completed.
Changes should be made to subsistence permit requirements. Subsistence permits should not be given to people who make their living as guides because the clients' meat is wasted while the guide hunts for additional resources for their personal use. Subsistence permit holders should be required to have full-time residency where the permit is issued for.
Commenters at Anaktuvuk Pass noted that scientists don't live here and don't migrate with the caribou the way the native people do. It was noted that the caribou do not migrate through Anaktuvuk Pass like they used to. Commenters wanted the BLM to clarify if the studies conducted on caribou can affect how they migrate. They noted that the migration is affected every time the State or the BLM or others try to do the studies. Residents of Anaktuvuk Pass are concerned over the change in migration patterns of the caribou. Anaktuvuk should have more caribou coming through than they have now. Subsistence hunters now have to go much further out to hunt caribou. The hunt is hurt by diverting the leaders of the migration. The Western Arctic, Teshekpuk Lake, and Central Arctic herds come through Anaktuvuk Pass, but they never get the Porcupine Herd. They described that they used to get the Porcupine Herd a long time ago before the construction of the Dalton Highway.
Residents of Anaktuvuk Pass shared stories and ideas of their traditional and family uses of neighboring lands. The Trans-Alaska Pipeline and Dalton Highway run through it. The BLM signage on the Dalton Highway should reference the entire traditional landscapes adjacent to the road because a part of their culture is tied to the caribou culture which exists now and existed pre-pipeline. People who live South of Anaktuvuk Pass cross-through and use their traditional lands, but they have different values and impacts. They noted the use area for trapping all the way up to Galbraith Lake to Nuiqsut and down the Umiat. A commenter noted that Nuiqsut residents trap a long way- all the way to Nigu Crossing and use these areas all the way to Umiat also. From Foothills to Umiat is where trapping occurs. There is a lot of trapping for wolverine. Trapping requires a lot of traveling and a big place. The trapping area is much bigger than the map provided.
The planning area contains migratory routes of numerous subsistence species that are harvested for consumption. Resource development in the planning area could generate contamination that would affect subsistence resources and affect human health. It is the cumulative effects of land use decisions (that allow mineral or oil and gas extraction) that change the lands and waters that are causing the most concentrated impacts. It is very expensive to substitute food from far away for subsistence foods. You can see how the Yukon River has been devastated by poor planning and poor management efforts. Any mining in that area they shouldn't be allowed to mine until every fish has come run towards the river. Ever since the pipeline was built it has blocked off our caribou. Does not want to see any restrictions on local hunters who go out there for caribou. We are having a tough time right now – we are facing a lot of competition for moose meat around here and caribou do help. There was one more thing - Trap lines of two people in Tanana that have trap lines that go back there they have to be recognized too. The RMP needs to note that Hughes residents hunt caribou by Hog River in the winter if they can get up there.

<p>The BLM must consider the traditional land use areas. "My father's traditional land use area was a lot different than mine but it's still mine. You talk about the Gisasa and the Kateel- the old people used to have a trail that goes from the Nulato River to the Gisasa to the Kateel and that were their traditional use area. Then you talk about going over to the Koyu (?) Flats, well they used to go across the hills and go into the Little Mud River and they used to go into the Kuskokwim country and that was our traditional use area. So our traditional use area is way, way bigger than the BLM thinks". There was historical use of Mud River and Kuskokwim country by Nulato residents who still utilize the areas for subsistence resources. A commenter noted that throughout the planning area near Nulato people do not go to their native allotment fish camps fish camps like they used to and noted " the thing about fish camps is everybody who used to have a fish camp; it actually belongs to them because it's part of the native allotment. When we were at fish camp, we used to harvest our fish, our wood, our berries, ducks and geese all at one time". A Nulato resident described sharing the results of fishing and hunting with others in the village especially those who are unable to fish or hunt as a traditional way of life.</p>
<p>Some Nulato residents noted they are not in favor of new access roads or easements because they encroach on subsistence areas. There is concern that new roads or easements would allow access to outsiders and negatively impact their traditional use areas.</p>
<p>Venetie residents wanted clarification on subsistence priority for rural areas, specifically:</p> <ul style="list-style-type: none"> • Who makes the determination that the moose population is low enough so that outsiders can't come in? • Who determines if there is a shortage allowing for a special hunt?
<p>A commenter in Venetie noted that the number of adult Dall sheep at Dietrich River is declining dramatically and that permits to guides conflict with subsistence needs. Permits should establish what sustainable harvest limits are available within the resources harvested.</p>
<p>Moose continue to be a subsistence resource in the Tozitna drainage, but the remoteness of the area and the current hunting season restricts the harvest level ensuring the resource can be maintained.</p>
<p>The subsistence resources in the Ray Mountains are stretched pretty thin; what is saving them now is their inaccessibility. Even nonconsumptive users could affect caribou especially if easy access to the area is available. The caribou may totally leave their historically used areas.</p>
<p>Ongoing collaborative management relationships with local watershed councils and native village communities will ensure the success of land management actions. Traditional knowledge can help fill the gaps in western science as well as serve as the base for determining future studies.</p>
<p>Traditional ways of knowing should be used to learn more about the history and traditions of the area, the value of resources, and the observed changes. There is a stigma against non-western ways of knowing and a standard that western science is the only means to document, monitor, and make decisions. In areas such as the Central Yukon area where an abundance of Traditional Ecological Knowledge (TEK) exists and little western science exists, the BLM should work to form a hybrid of balanced perspectives using information from both local experts and existing science.</p>
<p>The BLM should work with tribal governments, individual tribal members and other residents to ascertain pertinent traditional knowledge concerning the planning area and resources within the area. Traditional knowledge may be particularly helpful in understanding long-term ecological processes and sensitive resources.</p>
<p>Alaska Natives are the keepers of great knowledge and understanding. Working with this knowledge system and incorporating practices and information into the RMP will help foster stronger working relationships between governments and allow a sense of ownership and genuine participation in the process. The people who live in the villages are the people who will be most impacted by BLM's planning efforts and should have a strong part in management decisions.</p>
<p>The working relationships between the BLM and tribes should extend beyond the creation of the RMP into ongoing management strategies and scenarios – village residents observe the land and changes, are monitors of the environment and dependent upon their surroundings. Hence, ongoing collaborative management relationships will ensure the success of land management actions.</p>

The BLM should work with local people and the University of Alaska Native Place Names Documentation Project to learn and use place names and Tribal names. Traditional place names and Tribal names should be used in all documents and on maps.
I'm a little bothered about government agencies wanting testimony and traditional knowledge from villagers, because I've seen it so many times, and it's never produced a lot of results.
While the BLM should be using traditional ecological knowledge along with other types of data in developing the RMP, traditional ecological knowledge is not a management issue. The RMP should address traditional ecological knowledge as an information source, not a management issue/goal in and of itself.
The mouth of the Chandalar Valley and Dhah Dzuk Mountain are important use areas for residents of Venetie. There is a lookout spot for hunting, a lake on the mountain overlooking the mouth of the Chandalar. The Gwich'in name is Shoh Tok Thaa (Bear Nipple Mountain). Right across the river to the south is another mountain they use to look north, in areas not seen from the first lookout spot. These sites are on the southern slopes of Thazzik Mountain. Another spot, the southern base of Thazzik, is called Gwalaii (Flat place). "Between the two bluffs in the valley to the left and to the East Fork is Moose Highway." (see submitted map). There are lots of moose in that particular area. Another area is Ginnis' Vunklit (Ginnis' Valley) and lots of animals walk up it. There is a lake between Ginnis Vunklit and Johnny Frank's migratory route up Thazzik Mountain. It has the clearest and bluest water in the world.
The BIA conducted ancient land use mapping of the Venetie Block near Chandalar Mine last winter, which included old trapping trails. It may be valuable information, but Venetie Tribe should be consulted because the information is not public.

A.15. Lands and Realty, Public Land Order 5150, Utility Corridor

Commenters asked for clarification on access to BLM-managed lands, rights-of-way (ROWs), and ROWs avoidance areas. The RMP should clarify how BLM works with other agencies to build roads and grant ROWs for roads and trails and examine if there is any way to make it easier. The RMP should identify areas where the BLM could issue ROWs as well as areas where they should not. They asked for clarification on what the BLM would do if a trail crosses a Native allotment.
Can a tribe, city, state, or non-government agency put shelter cabins on the Tanana to Allakaket Trail? Clarify the permit process for doing this.
The ROW process should be easier. If you want to go west to the Yukon River and then down into the Kuskokwim where there are mineral deposits, you have to get to Ruby and their road. There is no way that you can get a ROW because it's all owned by Park Service, within a national wildlife refuge, or managed by the BLM. There is no way you can get a road into Hughes because it's all locked up.
The BLM should expand the Access Issue to include the consideration of new access proposals that have come up in the past such as a road to Nome. The plan must be developed in a manner that will not limit or constrict the possible locations of potential new road projects.
There should be allowances to for all-terrain vehicle (ATV) access, Wild and Scenic River designation, and enlarging material sites.
The RMP should include actions which conserve caribou habitat such as prohibiting industrial activities and creating right-of-way avoidance areas in core habitat.

<p>The BLM should clarify the process for conveyance of selected lands:</p> <ul style="list-style-type: none"> • Does the BLM convey some of the existing mining areas and would those claims transfer over to the State and still be valid? • In that area, there are 105 million acres left that the State of Alaska can select or is that the total allotment in that area that the State of Alaska can select? • Can there be comment on the transfer process of conveyed lands to the Native Corporations? • Clarify if the Doyon Road to Stevens Village area has been selected. • Is there any chance during this process that the BLM may relinquish control of some of that land? Is it necessary for the BLM to convey that much acreage in the State of Alaska? What are the numbers of units the BLM has and could convey? • The City of Bettles and the Subsistence Resource Committee would like to see the lands (the possible conveyance lands from Wiseman, south of Kanuti) left the way they are to protect that area so it can be used the way it is being used now.
<p>The BLM should consider and analyze potential cooperative management agreements or boundary adjustments for isolated parcels of land. For example the Lake Todatonten area and the strip of land extending east from the Dalton Highway towards Venetie may be candidates for cooperative management between the BLM and USFWS under a memorandum of understanding.</p>
<p>Current management of the planning area is acceptable.</p>
<p>Wholesale lifting of the (D)(1) withdrawals is not recommended for the following substantive reasons:</p> <ul style="list-style-type: none"> • The original reason for the ANCSA 17 (D)(1) withdrawals still remains as final selection and conveyance of selected lands to Native Corporations and the State of Alaska has not been completed; • The State of Alaska is over-selected in its land allocation, meaning that millions acres of federal land have been selected in excess of the State's lawful allocation. The State has not received conveyance through tentative approval or patent from the federal government for these lands as the State must decide which acres it will release from selection; • Wholesale lifting of millions of acres of withdrawals on public land is irresponsible management that encourages development speculation; and • It has been shown legally possible to retain (D)(1) withdrawals as was done in BLM's East Alaska RMP.
<p>Within the [renewable energy] zones, the BLM should prioritize lands that are most suitable for development, ensure adequate protective measures are imposed on development, and require both on-site and off-site mitigation of impacts to resources, as well as loss of uses.</p>
<p>There should be no new development nodes along the haul road (Dalton Highway). We are very concerned about roads that might lead off of this corridor. Most of this area is already open to mining. The balance is already tipped toward much more development.</p>
<p>Maintain current management of the Dalton as it pertains to development nodes; do not expand or add new ones. The Yukon Crossing, Chandalar and Happy Valley nodes require strong mitigating measures to ensure that any development does not impact subsistence use, integrity of habitat and water quality, as well as, low impact recreational use and scenic beauty.</p>
<p>Commercial node development is much preferred to strip development as has occurred on many other Alaska highways.</p>
<p>No new development nodes need to be provided south of the Brooks Range.</p>
<p>There is superb scenery at Chandalar Shelf which could easily be impaired resulting in a degradation of visitors' enjoyment. Furthermore, there is not a strongly documented need for the development node at this location.</p>
<p>Many areas in the plan are subject to Doyon land selections and, therefore, are subject to potential conveyance to Doyon at some time in the future. The final plan should not take or recommend any action that could impose new limitations on access to, or use of, Doyon lands.</p>

If the BLM proposes designation or continued designation of lands that surround or are adjacent to Doyon lands as ACECs, the RMP should not propose designation of those ACECs as right-of-way avoidance areas, as this restricts access to Doyon lands.
The 17b easements between Sithylem Lake and Kanuti Refuge should be relocated to the uplands to the north, as the existing trail easement seems unusable.
The BLM should use the following language to describe 17(b) easements: Section 17(b) of Alaska Native Claims Settlement Act (ANCSA) provided for the reservation of easements across Native Village and Regional Corporation lands to provide public access to publicly owned lands (including waters) for the purpose of recreation, hunting, transportation, utilities, docks, and other similar public uses. The BLM has not developed an easement management policy that provides a mechanism by which to address the concerns of land owners and easement users. There is currently no inventory on the status or condition of the easements.
All lands currently open to mining will be evaluated for withdrawal from locatable, salable and leasable mineral activities
The BLM should give grandfather rights over all federal and State lands to the citizens of Allakaket.
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, and whose planning decisions are dependent upon how the lands in the Planning Area are managed.
Consider a land use plan that would transfer management jurisdiction of BLM-managed lands adjacent to the northern boundary of the Yukon Flats NWR to the USFWS.
Current management of the Kanuti Hot Springs area is acceptable.
There are no hot springs in the Lake Minchumina area that would be suitable for commercial leases.
There is a little needle-like strip of land that is poking to the east from the Dalton Highway close to the Chandalar Mine. It is currently closed to mining according to the land status and the commenter noted they would like it to remain closed. If the State gets this land, the concern is the land status could change. The Chandalar Mine threatens Venetie.
Commenters at Bettles asked for clarification on any land exchanges that are presently proposed between Bettles and the BLM or the BLM and the State and asked how this would relate to the RMP. There were also inquiries as to the process for opportunities for conveyance from the BLM directly to a community so they can be transferred to the borough and used for house lots, berry picking, wood lots, and other community purposes.
Transfer of lands on the Colville tributaries such as Nuka, Kiligwa, Etivluk and especially Nigu Rivers to Noatak and Gates of the Arctic parks might be considered for efficiency and consistency of management, or the BLM could consider a serious approach to managing these fine arctic rivers as Wilderness.
Particular care should be taken to prevent sale or exchange of BLM-managed parcels highly valued by local communities for wildlife habitat, natural values, subsistence resources and recreation opportunities they provide. Further, disposal or exchange may be appropriate to assist with development around local communities.
How will the BLM monitor ground water contamination and migration of contaminants from pipeline-era waste sites to ensure there are no downstream effects on Conservation Units? As the BLM develops this plan there should be a renewed emphasis placed on multiple use.
There are areas of BLM-managed land with resource exploration and development potential that are encircled by Native Corporation Land in the planning area. The importance of resource exploration and development should not be overlooked when adjudicating 17b easements.
The RMP should be especially clear that management of submerged lands and shorelands is only applicable to the beds of federally owned waterbodies within the planning area.

The BLM should work with the State to resolve issues concerning ownership and use of rivers, lakes, and streams within BLM-managed lands where perceived management conflicts may arise. Cooperative management agreements between the BLM, the State, and other landowners may be developed when needed for specific waterways within the planning area.
There are numerous State-asserted navigable waterways in the planning area, and until the matter of navigability on individual waterways is determined, no changes to management should be made. Clarification of management authority can help the public understand where proposed management prescriptions may apply within the area. Public use of natural resources, including the waters of the State, is protected in Article 8 of the Alaska State Constitution and in current statutes and regulations. Current public uses occurring on rivers within the planning area are consistent with State statutes and regulations, and at this time effects associated with such use on these waterbodies appear to be negligible.
What are the existing and potential development areas for non-renewable energy projects?
All land withdrawals within the planning area should be identified and mapped, their withdrawal purpose explained and justification provided for retaining or releasing the withdrawal.
Alternatives developed in the EIS should not include a road accompanying a transmission pipeline from Umiat as pipelines have been shown to function well in the arctic environment without an associated road.
Public Land Order (PLO) 5180 should be modified to disallow metalliferous mineral entry for all lands currently governed thereunder, paralleling the protections provided by PLO 5184.
Building on the BLM's guidance, the Central Yukon and Utility Corridor plan should incorporate screening criteria for solar and wind projects that ensures sensitive resources such as lands with wilderness characteristics, ACECs, recreation management areas, and other specially administratively designated areas are protected from development.
Commenters in Bettles/Evansville appreciate that the federal lands near their communities are available for use and do not want to see a loss of privileges. Commenters did not want any degradation in access to federal land in the new RMP. They appreciate the lands managed as they are now and do not want to see a large influx of hunters from the urban areas into the planning area.
Commenters in Nenana noted that BLM-managed lands in the planning area should not be locked up and should remain available for personal use. One commenter asked if it was possible for the State of Alaska to manage BLM-managed lands.
Building on the BLM's guidance, the Central Yukon and Utility Corridor plan should incorporate screening criteria for solar and wind projects that ensures sensitive resources such as lands with wilderness characteristics, ACECs, Recreation Management Areas, and other specially administratively designated areas are protected from development.
What are the existing and potential right-of-way corridors (e.g., R.S. 2477) and how do they overlap with potential development areas?
Prohibit new road development within the primitive recreation zones.
The RMP/Draft EIS should include a description of how roads in the planning area impact resources and land uses. The RMP/Draft EIS should provide the current number of road miles and density including an estimate of the amount of any off-road vehicle usage. It should also evaluate the change in road miles and density that will occur because of the RMP activities and predicted impacts to water quality.
The BLM must give great weight to the views of communities that experience impacts from the Dalton Highway, either through spread of invasive weeds or through increased visitors or subsistence hunters who gain access to hunting areas by the highway.

The use of the Dalton Highway for the intent of transportation of energy resources, and economic and resources sustainability will be the priorities under consideration, and any practices that restrict multiple uses by State, Tribal, and private landowners will require written concurrence from the contiguous landowner(s) prior to implementation.
Roads on tundra may have impacts such as melting permafrost, expanding the tundra's active layer, accelerating snow melt, altering surrounding plant communities, flooding, and introducing non-native species.
Roads can cause disruptions in the physical and chemical environments surrounding it, which can affect the health of lichen and animals that consume it.
Commenter does not want State to take land up the Alatna River.
Commenter wants to see Native-selected land to go to native patent.
State and native selections should be identified in the plan.
In the Central Yukon Planning Area, the BLM should consult with the DNR before taking any actions that could potentially negatively impact resource exploration and development, especially on State-owned and selected lands. The BLM should recognize the State's need and intent to facilitate resource exploration and development of resources in the planning area.
The BLM should retain land near sensitive and ecologically important areas, including those within existing or proposed ACECs or other special management areas, and including citizen-proposed special management areas.
Lands identified in new citizen proposals for special management that include lands not owned by the BLM should be given priority for acquisition.
The State understands that fees collected for special use or ROW permits will be held in escrow until the selected lands are conveyed or relinquished, consistent with ANILCA Sec. 906(k)(2).
The community of Nenana is interested in opening-up the area west of Nenana, keeping it under State or local control as much as possible, with minimal federal control. One suggestion was a corridor from Nenana straight across to the Yukon and out to other parts of the state to expand mining, rural access, hunting access, and fishing access.
The BLM should provide detailed land status that identifies areas where the BLM manages the subsurface estate and a different entity owns the surface estate, particularly with respect to access.
Commenters expressed concern about the "little strip of land" (area west of Venetie and north of the Yukon Flats National Wildlife Refuge, referred to as the Venetie block) that the BLM manages. With rising gold prices it seems that there is greater interest to lease lands or exchange lands. This does not occur with native peoples as they own the land themselves and any subsurface title rights.
The BLM should clarify the concept and purpose of withdrawals in the RMP. The plan should also examine the implications of lifting withdrawals including whether the BLM has enough staff to monitor, plan, manage, and do compliance. A commenter noted that once the withdrawals are lifted under ANILCA, it is very difficult to put back.
The Chandalar region should retain its withdrawal status from development activity which was initiated in the early 1970s to further protect subsistence and fisheries resources.
The BLM should maintain existing mining withdrawal areas and consider closing additional areas currently open to mining so as to protect water quality and quantity.
The State supports BLM's 2006 recommendations to Congress and recommends that the RMP remain consistent with those recommendations which are: 92, 99, and 99 percent (respectively) of the ANCSA (d)(1) withdrawals should be lifted. If the BLM decides to deviate from its endorsements, the State requests that it be consulted and that the RMP clearly provide reasonable justification for retention of any withdrawal.

The BLM should consider if there are lands currently open for entry, location, and leasing that should be withdrawn to protect resource values of adjoining federal conservation lands (such as national wildlife refuges or national parks).
Given the demonstrated low rate of success of returning a previously placer-mined and reclaimed streams to functioning riparian systems, one might question if new areas be open (withdrawals lifted) to mining.
All BLM-managed lands south and east of the Nowitna NWR should be retained by the BLM. State-selections in this area should not be approved. The Telsitna and Sethkokna rivers and all drainages flowing into the Nowitna River should be retained by the BLM. All BLM-managed lands in this area should be closed to or remain closed to all mineral entry and mineral leasing.
The BLM-managed lands west of the Nowitna, in the upper Lost River, should be retained and eventually added to the Nowitna National Wildlife Refuge. East of the Nowitna, the BLM-managed lands in the upper Chitanana should also be retained and eventually added to the Nowitna National Wildlife Refuge. These lands should be closed to all forms of mining and mineral leasing.
The small block of land north and west of Chandalar Shelf, adjacent to the Gates of the Arctic National Park and Preserve, in the headwaters of the Dietrich River and the headwaters of the west fork of the Atigun River, should remain closed to mineral entry. This block of land and the remaining BLM-managed land inside the pipeline corridor from James Dalton Mountain, west, including all of the roadless section of the upper west fork of the Atigun River and the two roadless forks of the upper Dietrich River should be incorporated into the Gates of the Arctic National Preserve. Hunting and ATV restrictions on these lands should remain in effect, as they are now. At the very least the West Fork Atigun ACEC should be expanded to the south to include the two forks of the upper Dietrich River. This parcel of tentatively selected State land should not be approved and should be retained in BLM-management or traded to the National Park Service.
Maintain the majority of the current management for most of the lands in the Central Yukon Planning Area. Maintain existing mineral withdrawals and protections for Areas of Critical Environmental Concern.
That portion of the Killik River flowing north from the Gates of the Arctic Park, all the way to the Colville River, through State and Arctic Slope Regional Corporation (ASRC) land is a worthy land trade candidate. Presently recreational floaters continuing out of the park, beyond Udrivik Lake, are considered trespassing on ASRC lands, except for State navigability rights below the high waterline. (This is enough of an issue commercial outfitters are reluctant to continue below Udrivik Lake where public right-of-way exists). This is a shame in light of the quality of the float trip below Udrivik Lake.
The BLM should not modify PLO 5150 to allow for State selection. Lands within the Utility Corridor should remain under federal management because: Federal management of the area is more appropriate for tribes engaging in subsistence in part due to the federal requirement for government-to-government consultation; important wildlife, fishery, scenic and cultural resource values within BLM-managed lands between (east of) the Toolik Lake RNA and the Arctic NWR boundary including a portion of the Sagavanirktok River would be significantly affected by conveyance; areas near and north of Galbraith Lake are important for research and caribou; lands in the Dalton Highway Corridor will be much better managed for future generations; and the justification for retaining the Utility Corridor in federal management cited in the 1991 Utility Corridor Record of Decision is still valid.
Modifying PLO 5150 and conveying more lands to the State of Alaska would violate of the Federal Land Policy and Management Act (FLPMA) of 1976. In Sec. 102. [43 USC 1701] (a) of FLPMA the Congress declares that it is the policy of the United States that: the public lands be retained in federal ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest. 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.

<p>Modifying PLO 5150 and conveying more lands to the State of Alaska on lands adjacent to Arctic, Kanuti and Yukon Flats National Wildlife Refuges could result in significant negative impacts to refuge lands and important fish and wildlife resources in and adjacent to the planning area. If the lands are conveyed to the State, there may be proposals to develop these lands for a variety of high-impact uses, including mineral extraction. The BLM should thoroughly analyze and develop appropriate mitigation, including buffer zones, for any alternatives that includes lifting withdrawals on any of these lands.</p>
<p>PLO 5150 should be modified to make the Utility Corridor narrower. The corridor wider than necessary.</p>
<p>The BLM should modify PLO 5150 to allow State top-filed lands in the Utility Corridor to be conveyed to the State because: conveying this land would facilitate getting the gas pipeline through; the BLM has effectively closed down mining operations along the Dalton highway, conveyance to the State would allow miners to transfer their federal mining claims to State mining claims; transferring these lands to the State will open up more of the economic potential of the State; several nodes (such as at Coldfoot) and a large area of PLO 5150 North of the Brooks Range were conveyed to the State in the early 1990s as a result of the 1991 BLM Utility Corridor RMP. Since that time State management has continued to protect the transportation corridor and its resources. Absent a complete lifting of PLO 5150, at a minimum lands with significant rare earth element potential be released and conveyed to the State.</p>
<p>There is no plausible reason to further delay of the conveyance of the top-filed State-selected lands in the Utility Corridor. Continued withdrawal of these federal public lands will needlessly delay fulfillment of Alaska's land entitlement as guaranteed in the 1958 Alaska Statehood Act.</p>
<p>Of greatest concern to all residents in Wiseman is the possibility of modification of PLO 5150, and conveyance of the lands surrounding Wiseman to the State. This would be terribly detrimental for landowners and residents living in this community since pursuing the subsistence lifestyle is essential for survival of all residents here. The State-selected lands 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.</p>
<p>Under federal subsistence regulations, 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 of the Utility Corridor is by snowmobile 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, State regulations would preclude access to traditional hunting and trapping areas inside the Gates of the Arctic National Park.</p>
<p>State regulations in the Dalton Highway Corridor Management Area (5 miles from each side of the road) currently do not allow the use of motorized vehicles except: licensed highway vehicles within one-quarter mile of the Dalton Highway, boats, or aircraft. Large and small game hunting is closed except for the use of bow and arrow. State regulations preclude use of snowmobile for subsistence and would preclude transporting any hunter, game or gear with a highway vehicle further than one-quarter mile from the Dalton Highway. Wiseman Village is located 3 miles from the highway. If lands in this area were conveyed to the State, subsistence users in Wiseman and Coldfoot would effectively be isolated from Gates of the Arctic Park or other federal land. Additionally residents would lose customary use of snowmobile, or even licensed highway vehicles to transport hunters, game, or gear to or from our homes. The loss of the ability to harvest subsistence resources using customary and traditional methods would place an extremely great hardship on the local residents in Wiseman and Coldfoot.</p>
<p>Sec.906 (a)(2) of ANILCA 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 in the Utility Corridor, specially reserved and appropriated lands after 1993, is not proper or valid.</p>
<p>We encourage BLM to continue to exclude the "Prospect Unit State Selection Area," as identified in map 2.1 in the 1989 proposed RMP, from State selection. Further, we propose that this unit be renamed to reflect that it is not a State selection area.</p>
<p>If the Wiseman Option [utility corridor] is conveyed as it should be, the State should recognize subsistence gold mining and grand-father in current residents and allow continued traditional uses.</p>

The State supports statements in the 1991 Utility Corridor RMP regarding PLO 5150 stating, "No proposed action or set of actions should be interpreted as restricting or limiting the construction of new energy transportation systems within the Utility Corridor," and recommends retention of such language in the Central Yukon RMP.
<p>The BLM should reject the State's Utility Corridor top-filings for a variety of reasons:</p> <ul style="list-style-type: none"> • The State maintains a poor relationship with tribal and local governments. The State considers the best interests of the entire population, so small communities cannot compete with the voice of Anchorage. • PLO 5150 does not allow the BLM to give-away lands [to the State] that are highly valuable to the public; it is not legal. FLPMA specifically prohibits this, as does ANILCA. • ANILCA gave the State 25 years to selection lands; the State just came up with this selection idea 2 years ago. Being non-valid selections, BLM must also consider the considerable impacts to subsistence under Section 810 of ANILCA. All three State selections within the transportation corridor are high value to subsistence users.
In theory, if transportation corridor nodes selected by the State become State lands, it would limit mining access. However, the BLM has not approved mining claims in years anyway. I showed my BLM mining permit to an Alaska Department of Natural Resources representative. They said this application was one of the most complete they had seen, but the BLM has not approved it yet.
The BLM should not suppress future economic activity by holding onto the Utility Corridor lands. The State should be allowed to select parts of the corridor. The BLM-managed lands are currently over-managed.
<p>The public wants more information about the future development plans that would cause the State to top-file the Utility Corridor development nodes.</p> <ul style="list-style-type: none"> • Would the State develop a hotel or big gas station at Yukon Crossing area? • Does the expansion of State land include the proposed Umiat Road? • Would the State close the nodes to hunting? If the property was transferred to the State, it blocks access to Gates of the Arctic National Park. We would be precluded from hunting moose near our homes because we could not transport game across State land. • How much land does the State want?
BLM's management of the Dalton Highway corridor could affect the ability of bordering Refuges (Arctic, Yukon Flats, Kanuti) to meet their legal responsibilities and the expectations of the public
Regarding the Dalton Highway the issue of access is about more than just what happens there but also the access it provides to adjacent lands and how they are managed. The Dalton Highway is a gateway to other State and federal lands that may need protection. The wildlands recreation that is able to occur because of the State's buffer zone, 5 miles on each side for protecting the type of access that we have for access to hunting and fishing is important. Wildlands recreation and conflicts with subsistence should be addressed in the RMP with regard to the Dalton Highway. Originally the Dalton Highway was closed to the public and it is a well touted recreation as well as tourism resource. The plan should examine how those things change with the other activities including the increasing pressure of the tourism and wildlands recreation impose to other uses. Those are the important quality of life issues to Alaskans.
In reference to the Utility Corridor Plan, we're got a lot of oil and gas pipelines that may yet come through that corridor. There are still a lot of plans that would go through that area, so it should still be managed as a utility corridor. There shouldn't be new roads [in the Utility Corridor]; it is a very important region.
The Utility Corridor lands are national interest lands that deserve the best environmental protection possible consistent with the overriding goal of providing energy transportation. The BLM should take protection of the scenic quality of the corridor very seriously.
The plan needs to address energy transportation needs of natural gas pipelines, associated infrastructure and activity, and other natural gas transportation projects (e.g., natural gas trucking to Fairbanks) within the Utility Corridor. It should address any existing rights-of-way for gas pipeline projects, as well as potential projects, and the cumulative impacts to the planning area. The management goals for Utility Corridor lands also need to address impacts of potential future natural gas pipelines and potential new roads

The plan should provide maximum protection to subsistence resources and way of life and maximum sensitivity to the integrity of parks, refuges, and preserves adjacent to the Utility Corridor.
The BLM should describe how Utility Corridor nodes would be impacted if conveyed to the State.

A.16. Mitigation

Mitigation measures should be included to ensure that any post decision adverse consequences can be reduced or avoided for social, cultural, economic and environmental health.
The RMP should prohibit dust-control treatments (such as chemicals) that may be harmful to caribou, their habitat and people on road through BLM-managed lands.
Mitigation should be implemented in advance of the impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.
Any restriction on a given activity that is observed to unreasonably impact a resource should be based on data, and any system of remediation should be selected and directed on the specific disturbance mechanism
The BLM should recognize that multiple use activities often incorporate mitigation measures, and that a one-size-fits-all plan should not be considered.
The Central Yukon plan should provide more detail, clearly define terms, and incorporate objective language so that the range and severity of impacts (of proposed actions) may be accurately portrayed in the environmental consequences section.
Whenever exceptions to required operating procedures and stipulations for protection of resources, resource uses, and social and economic conditions are employed, the environmental impact analysis for each resource will reflect the increased impact from allowing such an exception.
In both lands currently open to mining and those proposed open to mining, the BLM should require use of compensatory mitigation to offset losses of aquatic resources. "All practicable steps to avoid and/or minimize impacts to aquatic resources must be taken before proposing compensatory mitigation to offset project impacts."
The BLM should consider use of stream buffers (as part of the mitigation "avoid and minimize" sequence described in the U.S. Army Corps of Engineers brochure) in watersheds deemed high priority (for fish, aquatic resources, wildlife, subsistence) to minimize adverse impacts from surface disturbance.
The RMP should include mitigation measures to ensure that any post-decision adverse consequences can be reduced or avoided.

A.17. Public Safety, Health and Environmental Justice

The RMP must comply with Executive Order 12898 regarding environmental justice.
"Managing to avoid litigation" has become a huge issue in public land management. The threat of appeals and lawsuits drives the decision-making process. If you don't sue, you lose. Motorized recreationists have not used lawsuits to the extent that the environmental groups have and consequently, motorized opportunities are being eliminated because they are a "lesser threat" of lawsuit and the overarching needs of the public are being ignored. This is the "new" environmental justice issue.
When considering economic production, resource extraction, subsistence uses and protection of instream flows, it is essential that federal agencies take into account the disproportionate impacts of climate change, water diversions, toxic emissions and water development on Alaska Native Villages, as well as the potential for management of water resources and participation in the decision making processes.

<p>The BLM needs to consider the fragmentation of the land management planning processes among all land managers in the area. Each managing agency has its own unique process, statutes and rules that people must know to then be able to engage in the planning process in a meaningful way. This is an environmental justice issue that impacts the well-being of community members. Planning processes that require multiple meetings with multiple agencies, land managers and developers is an action that causes disproportionately high and adverse impacts. It is a real burden community members to learn all the planning processes, understand the plans, and attend meetings to effectively advocate for themselves. This is too much to ask of for many communities and something the agencies themselves may not be aware of. The BLM should consider how meetings and planning processes can be combined and streamlined.</p>
<p>Healthy Yukon River salmon stocks are of vital importance to the primarily Alaska Native communities in the planning area. Harm to the salmon stocks because of increased mineral development and other changes in use places a disproportionately high burden on these communities. The BLM should analyze the disparate impacts placed on Alaska Native communities in the Yukon River as a result of changes to salmon populations, subsistence and commercial fisheries and access to subsistence resources as required by Executive Order 12898.</p>
<p>Various studies have found that riding off-highway vehicles such as motorcycles and four-wheelers provide health and physical fitness benefits for those who participate in these types of activities; including benefits to both cardiovascular fitness and muscle strength.</p>
<p>The impact of motorized closures on the health of our members and the loss of the benefits of OHV recreation are significant issues to motorized recreationists. In order to make a reasonable decision, the BLM must adequately consider the issues and impacts associated with motorized closures on the mental and physical health of the public. These issues are critical due to the cumulative effect of all motorized closures.</p>
<p>The BLM should incorporate a systematic public health analysis into the Draft Central Yukon RMP/EIS and consult with appropriate State and tribal health authorities to identify data sources, analytic approaches, and potentially effective mitigation measures for any issues identified. Although there is no specific NEPA requirement for a Health Impact Assessment, the integration of important information reflecting social and physical health could improve the process and increase understanding of long-term impacts of land management.</p>
<p>If RMP activities will impact the communities or resources upon which the communities depend (e.g. subsistence resources), the Environmental Protection Agency (EPA) recommends a health impact assessment screening be conducted to determine if a full assessment of health impacts may need to be developed. The BLM should contact the State of Alaska Health Impact Assessment Program for assistance in determining if a formal Health Impact Assessment is warranted for this project</p>
<p>Learned helplessness or the belief that your actions will be futile is an epidemic affecting the nation (page 70, ISBN 0-671-01911-2). The evaluation of social issues in the RMP must also include an evaluation of conditions contributing to learned helplessness including the lack of recognition and attention to the needs of motorized recreationists and the significant social problems that result from these conditions.</p>
<p>In the past 30 years, the prevalence of overweight and obesity has increased sharply for both adults and children. This disturbing trend has prompted the President to promote a health and fitness initiative. OHV recreation is an activity that meets the physical requirements of the President's fitness program.</p>
<p>Off-road riding also has psychosocial effect of enhancing quality of life and reducing stress.</p>
<p>Sadly, one indicator of the condition of the human environment is the suicide rate. Motorized recreation is popular and it is a very healthy and positive human activity that can help address this significant human issue. The BLM can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities.</p>
<p>Videophilia - the new tendency to focus on sedentary activities involving electronic media has become a significant social problem. People in the U.S. and other developed nations are spending far less time in nature than ever before. At the same time, the interest and desire to participate in OHV recreation in the outdoors is increasing. OHV recreation is a reasonable alternative to increase participation in outdoor activities and issue and solution should be adequately addressed by this plan.</p>

The Department of Environmental Conservation (DEC) has numerous regulations used to monitor and mitigate impacts to resources within the state, including human waste disposal, air and water quality standards.
The RMP should consider additional health and safety services more readily available to the public along the Dalton Highway such as law enforcement, search and rescue, medical, vehicle refueling and vehicle maintenance if more roads are connected to the highway.
There is a need for public shelter cabins between Tanana and Allakaket as people travel this route.
The RMP should reinforce a "no hunting within a designated distance of the road rule" along the Dalton Highway to help prevent the public from leaving vehicles in the middle of the road. There should be discussion on whether the utility corridor is open for sport hunting because it poses safety concerns.
It has been observed that wildlife photographers/tourists in Wiseman and on the Dalton Highway have been "chased away" by hunters because they are interfering with hunting. It is hard to say who was first or who is interfering with whom. Low impact users' use of public lands should be protected.
Commenters asked about sites within the planning area that may be contaminated. Particularly the status of those sites at Galena regarding the Air Force Station.

A.18. Process Comments (meetings, planning, NEPA)

MEETINGS
The BLM should use a simple checklist when organizing meetings in rural Alaska to prevent conflicts with other major community events and inform the community about the meeting. If a meeting conflict is unavoidable, consider a presentation at the established community meeting.
When holding meetings, the BLM must consider learning styles and employ many different communication methods, systems and styles. Not everyone communicates best with written information; some communicate best with verbal or visual information as in maps.
Good maps are essential and scale matters. For residents of a remote rural village, showing a map that depicts an area the size of the state of Maine isn't constructive. Consider providing community-scale maps showing 40-50 miles circumference from the community with known travel-ways during scoping. Additional helpful information for future maps may include topographic information and additional place names.
The right tools must be present at section 810 hearings for the best possible information to be passed between government representatives. To document observed migration patterns, harvest areas, and subsistence resources, the BLM must have maps of accurate scale and the suitable working materials for appropriate documentation.
Community members are only able to attend BLM meetings if they are aware of the opportunity. Effective posting of meeting notices is of paramount importance and should include: Post office; school; village tribal office; tribal corporation office; store and gas station; local radio; local television scanner channel; and phone calls to community leaders. Meetings should be scheduled and published on line at least 60 days in advance of the meeting.
The BLM should attend large formal gatherings of residents from the planning area such as the annual meeting of the Association of Village Council Presidents or the Alaska Federation of Natives. A simple booth at the gathering staffed by two agency representatives or volunteers could make information available more widely.
The BLM should provide opportunities for informal learning about the draft plan and each alternative's potential effects on subsistence resources in rural communities the day before holding a public hearing. The BLM should stay longer in communities to maximize communication.
It is imperative, given the expense of agency planning team travel to remote Alaska and in respect for the capacity of the community, that any meeting is scheduled when the community is available.

The BLM must develop a clear strategy for conducting 810 hearings which are often held in conjunction with public comment meetings. These meetings must clearly define objectives for attendees and segment discussions to allow for appropriate use of time and effective information sharing. This may mean: establishing agendas that guide discussions and define the desired outcomes; sending an outline to the community in advance so time and community resources can be allocated to organize and gather information to present to the BLM; paraphrasing technical language so that people in attendance are not discouraged from testifying; and holding an informal educational meeting the day before the hearing.
The BLM should consider a series of meetings or webinars to introduce complex information.
NEPA
The alternatives analysis in the EIS should compare alternatives with respect to how well they respond to the stated purpose and need, goals and objectives, and, scoping issues.
The environmental impacts of each alternative should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. Impacts should be quantified to the greatest extent possible. It is also useful to list each alternative action's impacts and corresponding mitigation measures.
In the EIS, the BLM should use tables, maps, figures, charts, and photos as much as possible and wherever appropriate to present and display information and specific features of alternatives so that the various alternatives can be clearly understood.
The Draft RMP/EIS must include discussion of environmental effects and mitigation measures. This should involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and mitigation measures for the impacts
The EIS should: a) Identify the current condition of the resource as a measure of past impacts; b) Identify the trend in the condition of the resource as a measure of present impacts; c) Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends; d) Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives; e) Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts; and f) Identify opportunities to avoid and minimize impacts.
Where off-highway vehicles are permitted, the BLM should make a full disclosure of the effects of this use on vegetation, wildlife and habitat, aquatic resources, riparian habitat and different soil types.
The impact of lost opportunities for motorized recreationists are significant, irretrievable, and irreversible. NEPA requires adequate evaluation and also adequate mitigation of irretrievable and irreversible impacts. The RMP/EIS should provide for adequate evaluation and mitigation to avoid the irretrievable and irreversible impacts of lost opportunities on motorized recreationists.
The NEPA process should be an issues driven process. The significant issues for ravel management should be those that have the greatest impact on motorized recreationists. The RMP/EIS should address all of the significant issues that affect motorized recreationists including the importance of each existing route, cumulative effects of all motorized closures, and need for more not less motorized recreational opportunities.
A RMP should be about identifying and meeting the needs of the public for use of and access to their land. Less than one percent of the visitors to public land are involved and comment during the planning process. In order to assure a fair and unbiased process it is necessary to separate the true issues and needs of the public from the influence of well-funded special interest groups with a limited-use agenda. The BLM should develop procedures that equalize the influence received from groups with annual budgets greater than \$100,000 so that this influence does not obscure the needs and benefits of 99 percent of the public that are less-organized, less funded, and have a wide diversity of multiple use interests.

Comparing man-caused impacts to natural impacts is a reasonable approach that should be used to test for the significance of impacts and improvements. The impact analyses should compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts or management actions such as the “Let it burn” policy.
If you cannot measure an impact then it is not a real impact.
Because activities under the RMP could potentially impact a variety of resources on in the planning area for an extended period, the RMP should include an environmental monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The RMP should describe the monitoring program and how it would be used as an effective feedback mechanism so that any needed adjustments can be made to meet environmental objectives throughout the life of the plan. Monitoring should be based on the best available scientific information.
Multiple use public lands should be managed for the greatest benefit to the public; in an environmentally sound and reasonable manner; to avoid the pursuit of environmental extremism; and to promote the shared-use that they were intended for versus segregated-use or exclusive-use.
The most equitable management of public lands is for multiple use. Congress recognized this need with the Federal Land Policy and Management Act of 1976 (FLPMA). To be responsive to the needs of the public all remaining multiple use public lands should be managed for multiple uses, including motorized access and motorized recreation. The BLM has a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.
Motorized recreationists are very concerned that a reasonable alternative will not be adequately addressed in the RMP/EIS and that the process is predisposed. To prevent this from happening a Multiple Use Review Board should be established to assure that the decision making reflects the multiple use management goals and the needs of the public. Also a Multiple Use Review Board should look into all past travel management decisions within public lands to determine whether all decisions have adequately considered the needs of multiple use and motorized recreationists.
The agency must formulate a lawful “no action” alternative so that the public and decision makers may reasonably compare and contrast other management alternatives.
Decisions should not be driven by the number of perceived participants and comments received. The NEPA process should be driven by issues and needs. The establishment of recreational opportunities on public lands should be based on public need. The need for these facilities is not based on the level of citizen involvement, but on an assessment of need developed by the agency. The public has a basic expectation that agencies will look out for their interests and the best interests of the public are met when agencies respond to the needs of the public in this manner. The use of public participation in decision making for this proposed action must be monitored to assure that it does not obscure the needs of all citizens who rely on the project area for their recreation and livelihoods.
Why use so many indirect attempts such as public meetings and open houses to gather feedback from motorized recreationists? Why not just go directly to motorized recreationists in the field and at club meetings and ask them? NEPA encourages direct coordination with the impacted public instead of a process tailor made for special-interest environmental groups.
The number of NEPA actions is overwhelming. Recently the route designation process has added considerably to effort required. It is simply impossible for the public to comment on every road, trail, and NEPA document. It is not reasonable to expect working class citizens to comment on every NEPA action and the route designation that potentially affects them at some point during their recreation lifetime.
Because of the long trend of motorized closures combined with the lack of acknowledgement of the needs of motorized recreationists or any action on those needs, most motorized recreationists have given up on the public involvement process. This should not be taken as an acceptance by motorized recreationists of the agency’s direction and decision. Rather it is a huge socioeconomic and environmental justice issue that was significantly ignored by the process and decision. The proper reaction to this condition would be to adequately address the comments that are received, develop processes that would successfully get input from motorized recreationists, and then develop alternatives and actions that meet the needs of motorized recreationists.

<p>The NEPA process is complicated and unapproachable to most of the public yet there has never been a program to inform, educate, and increase the public's awareness and ability to work with the process. This has contributed to extremely low participation in the NEPA process by some sectors of the public and poor acceptance and opinions of the process by the public. Additionally, a quantification of the level of public acceptance of the NEPA process has never been undertaken. The significant negative impact on the majority of the public resulting from the lack of information, education, understanding and acceptance of the NEPA process should be evaluated and the cumulative negative impacts associated with this should be adequately mitigated.</p>
<p>The public involvement process should not allow well-organized and funded groups to take opportunities away from less-organized and funded individuals. Those with significant NEPA knowledge, training, and skills are able to successfully manipulate the process and have benefited significantly from their ability to influence decisions. This is an environmental injustice.</p>
<p>The significant impact that national foundation funding to environmental groups has on motorized recreationists should be adequately evaluated and considered including the impact of foundation funding on: the NEPA process; the decision-making process; and the significant use of legal challenges to nearly every decision involving multiple use proposals for public lands. In addition, the document should evaluate the cumulative negative impact national foundation funding has had on all past NEPA actions involving multiple use and motorized recreation.</p>
<p>The current precedent is that legal actions and appeals are the most effective way to influence decisions on how public land is to be managed. Unfortunately, the true public need for management of public lands for multiple uses is not adequately defended because agencies are so focused on countering the massive legal attack by environmental groups.</p>
<p>There needs to be adequate peer review of all impact analyses and include experts that are neutral about motorized recreation. The peer review process must require standards which assure that such scientists are qualified and independent, and provide the public the opportunity to review such factors.</p>
<p>Pursuing environmental perfectionism is not an equitable goal for management of public lands. We believe that public lands are here for us to enjoy and use responsibly for the large number of purposes. The underlying doctrine of the extreme environmentalists is that humans are intruders on and have no place in the natural environment. Expecting any or all of the public to live with the consequences of uncompromising environmental perfectionism is unreasonable. Additionally, the expectation of a static environment is unnatural. The impacts associated with the pursuit of environmental perfectionism on the human environment be evaluated, including the cumulative negative impact.</p>
<p>The agency needs to emphasize data and real observations of visitors to the public land to establish public need and resources allocation versus paid representatives, attorneys, and form letter comments sent in by non-motorized groups because they are not an indicator of actual visitors to the project area.</p>
<p>The purpose and need for this action needs to be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. This approach will avoid the creation of a significant issue with the process and a serious procedural deficiency in the purpose and need.</p>
<p>The Draft RMP/EIS should clearly identify the purpose and need to which the BLM is responding to in proposing the alternatives, including the broader public interest and need. The purpose of the proposed action would typically be the specific objectives of the Draft RMP/EIS, while the need for the plan may be to eliminate a broader underlying problem or take advantage of an opportunity. The purpose and need should be a clear, objective statement of the rationale for the proposed action, as it provides the framework for identifying project alternatives.</p>
<p>Given the broad purpose of the preparation of the RMP and the information compiled by the public regarding natural and cultural values of these lands, the range of alternatives should include a number of alternatives to protect their conservation values.</p>
<p>The Draft RMP/EIS should include a range of alternatives that meets the stated purpose and need, goals and objectives, and responds to issues identified during the scoping process. The Council on Environmental Quality (CEQ) recommends that all reasonable alternatives be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS.</p>

Consistent with the purpose of the NEPA, the EPA encourages the consideration of alternatives that protect, restore and enhance the environment. The EPA strongly supports efforts to identify and select alternatives which maximize environmental benefits, and, avoid, minimize, and/or otherwise mitigate environmental impacts.
The CEQ regulations at section 1502.14 direct federal agencies to identify a preferred alternative in the draft and final EIS, if one exists, unless another law prohibits the expression of such a preference. Identifying a preferred alternative early in the process informs the participating parties and allows for meaningful comments on the direction that the BLM may be heading. This is especially important considering the size of the planning area, and the numerous overlapping and potentially conflicting management decisions that will undoubtedly be taken into consideration and made available for review and comment.
The BLM must give careful thought to the long-term potential harm to resources and conservation goals that may result from proposed roads to the Ambler mining district, Umiat, and Nome. These roads would create tremendous impacts on cultural, subsistence, wildlife, recreation, sport hunting, law enforcement and many other existing conditions in northern Alaska. The BLM must employ due diligence in assessing cumulative impacts associated with State requests for land conveyances, rights-of-way, and permits.
The proposed Umiat road is designed to open the gateway to many development activities in the region. The road would lead to the Umiat Oil and Gubik Natural Gas Fields, the Nanushuk coal reserve, and more resources within the NPR-A, and throughout the foothills. Because the State anticipates the road would encourage drilling and mining throughout this vast area, these activities are reasonably foreseeable consequences of the road and must be considered during cumulative effect analysis.
To determine the best management for the planning area the BLM must review impacts and the affected environment on a larger scale, beyond the borders of the region. This will help to understand priority resource issues, (such as Yukon River fisheries) tailor decisions to specific needs and circumstances, and analyze cumulative impacts.
The CEQ regulations for the proper implementation of NEPA recommend that the text of final environmental impact statements shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages. The agency is ignoring the page limit guidance and the documents produced are way beyond what the public can process.
Even though CEQ Part 1502.8 requires that an EIS be written in plain language, so that the public and decision makers are able to understand the content, the language used in most RMPs requires three to six years of college education. This may limit or bias who participates in the process. The RMP should have a layout with clearly prescribed goals and objectives making it easy to follow and encouraging participation to create the best management plan possible.
If and when our population is equal to California, then an alternative could reasonably consider requirements necessary to manage urban impacts. Until then, local standards and culture should be the overarching criterion.
There is a need for agencies to address cultural, institutional, geographic, and other barriers for meaningful public participation. The RMP process should incorporate effective outreach to affected groups. There are diverse constituencies within the planning area because it is so large. Community participation must occur as early as possible if it is to be meaningful and more notification should have been given for some scoping meetings. Standardized terminology and mapping presented at the meetings and in the RMP should not contain regulatory language. Vocabulary and acronyms used in meetings and documents should be commonly used and understandable to all stakeholders.
Commenters asked for clarity and transparency on the comment periods, how to comment, suggested alternatives to be considered, and next steps in the NEPA process. Due to the size of the planning area and length of the RMP, residents expressed the need for public involvement activities, return visits to their communities, and updates throughout the NEPA process. Commenters asked that the BLM keep them informed of the next steps in the NEPA process and requested information on how to access the scoping report and when the next opportunities would occur in the NEPA process to provide comments. It is important for the BLM to clarify the time frames of when the new plan would take effect.

The purpose and need for the plan update should include the State's Roads to Resources, the greater interest in minerals, and address the crisis of Yukon River Chinook salmon. The RMP contains a good part of the spawning areas, headwater, streams, as well as portion of the Yukon River area. Actions taken on BLM-managed lands could be positive for salmon habitat.
The RMP should explain the relationship of this action to other legislation such as ANILCA and State laws, its relationship to adjacent BLM plans such as the NPR-A Management Plan, and its relationship to other agency plans including the State's plans.
Minerals, mineral development, and management of mineral resources should be carried forward for analysis in the RMP process.
In considering the scope and issues carried forward for analysis in the plan, the BLM should consider that its lands are part of a complicated land management regime that contains a large scale of natural intact ecosystems. Natural intact ecosystems are an important value that should be acknowledged in the RMP.
Several issues for analysis that should be carried forward into the RMP should include fish and wildlife resources, subsistence resources, potential contamination of these resources, protections for traditional lifestyles and cultural values, and protection of the environment.
The BLM should clarify that the RMP is their agency's planning effort and not Alaska Department of Natural Resources. The BLM should clarify how recent proposed measures by the State of Alaska could affect them (particularly road construction or other development in Alaska). Concern was expressed that there was no mechanism for individuals to comment on what may occur on lands that are State-owned and in the vicinity of BLM's Central Yukon Planning Area. The public needs to be notified well in advance of actions occurring on the ground so that they can be part of the decision making process.
Applying science to land management planning requires well-defined, measurable standards developed via a robust public involvement process; the employment of science-based analytical tools to evaluate compliance with the standards; and consistent implementation of science-based analysis and decision making.
The plan should minimize the cumulative impact potential from known and future development for: watershed water quality, animal migration routes, fish and bird habitat, subsistence practices, human health, and climate change.
PLANNING
Per the BLM Land Use Planning Handbook, adaptive management should be prioritized to ensure goals established in the RMP are met with desirable outcomes. The uncertainty of climate change impacts, changing wildlife considerations, unforeseen shifts at the ecosystem level and possible impacts on human health from future development obligates the BLM to ensure that the RMP has clearly identified outcomes and monitoring to determine if actions are meeting outcomes. If this is not occurring, the BLM must begin facilitating management changes that will best ensure outcomes are met, or re-evaluate the outcomes.
The RMP must explicitly recognize and take into consideration provisions of ANILCA that apply to the planning area—both on BLM-managed lands and lands managed by other federal agencies—to fully inform the public and land managers of applicable law and to ensure that proposed management actions are consistent with ANILCA.

Applicable ANILCA provisions include but are not limited to: Section 811 (a) and (b)- ensures motorized subsistence access on all federal public lands, subject to reasonable regulation; Section 1101-1107- in recognition of Alaska's undeveloped transportation and utility network and future needs, establishes a consolidated application process, including decision-making criteria and right-of-way terms and conditions (43 CFR 36); Section 1110 (a) - provides for motorized and non-motorized access for traditional activities and for travel to and from villages and homesites, subject to reasonable regulation (43 CFR 36.11); Section 1110 (b) - establishes a right of access to inholdings within and effectively surrounded by conservation system units (CSUs); Section 1111 - provides for temporary access to or across CSUs, WSAs and lands managed to maintain wilderness character, to State and private in holdings for the purposes of survey, geophysical, exploratory, or other temporary uses; Section 1303 - provides direction regarding construction, use and occupancy of existing and new cabins and related structures; Section 1306 - addresses the establishment of administrative sites and visitor facilities within or outside CSUs; Section 1310 - provides for access to, and operation and maintenance of existing facilities, and the establishment, operation, and maintenance of new facilities in CSUs; Section 1316- provides for the continuance of existing uses and future establishment of temporary structures and facilities directly related to the taking of fish and wildlife on all public lands; and Section 1323(b) - provides for access to inholdings on general BLM-managed lands.
Whenever practical, the BLM should use direct quotes when referencing ANILCA provisions.
The BLM should be as consistent as possible with policies and conservation plans of the adjoining land managers (USFWS/NPS) as well as local governments in the planning area and work as closely as possible with these neighboring land managers and users. Reasonable consistency or compatibility in terms of management will minimize user conflicts and confusion.
The BLM should strengthen relationships with National Park Service and U.S. Fish and Wildlife Service to align BLM's management in the Brooks Range to complement adjoining land managers missions, while still fulfilling BLM's mission for diverse use. There is more strength in unity and complimenting each other's missions. The benefits of this consideration would maybe seem intangible at first, but would be huge in the long run.
The plan must be consistent with the standards and guidance set forth in FLPMA, NEPA, CEQ, National Historic Preservation Act, the Wild and Scenic Rivers Act, the Migratory Bird Treaty Act, ANILCA, Executive Orders 11988 (Floodplains Management) and E.O. 11990 (Protection of Wetlands) and other federal laws, regulations, and policies as required.
The BLM should consult with Yukon River Intertribal watershed Council, Tanana Chiefs Conference, Council of Athabascan Tribal Governments, and Yukon River Drainage Association.
The RMP must consider the U.S. Fish and Wildlife Service's Comprehensive Conservation Plan (2008), as well as Alaska Department of Fish and Game plans such as the Koyukuk Moose Management Plan.
The RMP must coordinate management programs with those of other federal agencies. This includes, but it not limited to, considering management goals for the national wildlife refuges in and adjacent to the planning area and ensuring that water quality requirements will be met on waters draining into refuge lands. Some of the primary concerns on refuge lands include: road-related impacts, invasive plants and animals, and resource development that may impact water quality and quantity.
The State requests that the plan explicitly recognize the Alaska Department of Fish and Game's authorities that overlay the BLM's land management responsibilities. References in the preliminary planning documents erroneously imply that the BLM manages wildlife and fisheries populations. The RMP must accurately describe the BLM's management role in habitat management, and the State's responsibility as the manager of fish and wildlife and their populations, with some limited exceptions where Congress has expressly provided that responsibility to the federal government. Regardless, wildlife and fisheries population management are outside the scope of this RMP.
Relevant State plans and identified management areas to be considered during planning include: Tanana Basin Area Plan (being revised to the Yukon Tanana and Eastern Tanana Area Plan); DNR State Parks Management Plans; Alaska Recreational Trails Plan; Alaska's Outdoor Legacy, Statewide Comprehensive Outdoor Recreation Plan, 2009-14; and DNR State Forest Management Plans, Tanana Valley State Forest Management Plan, 2001 Update.

The BLM should include the Fact Sheet "Generally Allowed Uses on State Lands and Conditions for Generally Allowed Uses" as an appendix in the RMP. This Fact Sheet summarizes regulations at 11 AAC 96.020 and 96.025 into a clear and practical format and can facilitate a better understanding of the "Generally Allowed Uses" if and when they are referenced in the RMP, particularly in discussions an proposed policies regarding off-highway vehicle use.
The Alaska DNR Area Plans establish management intent for State-selected lands. The RMP should adopt the management intent for State-selected lands from these area plans. The RMP should also recognize the State's need to facilitate resource development and utilize the State's land base for multiple uses.
The BLM should work with the tribal governments, watershed councils, subsistence users, and the natural resource department of the Tanana Chiefs Conference and Inupiat Community of the Arctic Slope to better manage wildlands and wildlife resources in the Central Yukon Planning Area.
The BLM must honor ongoing efforts of tribes as land users and stewards to restore and protect their surrounding resources. The Council of Athabascan Tribal Governments is working on a Traditional Land Use Plan and should be contacted to coordinate efforts, share information and avoid conflicts of future management.
Coordination with Venetie Village Council and other Tribal governments means ongoing communications to resolve any inconsistencies between land management (FLPMA section 202 (c) (9)) and allow ample time for Tribal representatives to comment on BLM management plans (43 CFR 1610.3-1). The process must account for the remote nature of communities and unique situations to allow for delivery and review of planning documents so that meaningful meeting between governments can occur and in-depth comments can be created.
The community of Allakaket remarked that it would like to be a cooperating agency, and they are going to request government-to-government consultation. In addition, they noted that Tanana Chiefs Council represents several federally recognized tribes within the planning area and it is the job of the Executive Board of that organization to have the best interests of villages represented.
The Central Yukon Planning Area encompasses and abuts lands managed by multiple entities, including the U.S. Fish and Wildlife Service, National Park Service, State of Alaska, Native corporations, and Tribes. This is an opportunity to evaluate cooperative management of wildlands and wildlife that do not recognize the land management jurisdictional borders, but could benefit from cooperative management across those borders.
The RMP should assist in resolving, to the extent practical, inconsistencies between federal and non-federal plans and current subsistence, cultural and customary uses. Further, the BLM needs to work with current users of the lands to ensure conflict isn't created due to land management decisions made in this plan.
The BLM should work in concert with the U.S. Fish and Wildlife Service, National Parks Service, Tribes, and communities to maximize management that takes into account values managed by all stakeholders, and include this commitment in the Central Yukon RMP in relation to lands with wilderness characteristics, recreation management areas, Areas of Critical Environmental Concern, wildlife corridors, traditional and customary uses, subsistence, and historical and cultural sites.
A national mapping standard for travel planning actions must be developed to reduce confusion to the public.
The maps used in the environmental document should be familiar and easily interpreted by all citizens. Maps should identify streams, road numbers, trail numbers, landmarks and key topographic features in a manner that all citizens can easily interpret.
Oftentimes, the text and maps in travel management documents do not effectively communicate or describe to motorized visitors the trails and roads that they are accustomed to visiting. Therefore, motorized visitors do not realize the extent of proposed motorized closures. This lack of understanding will lead to poor support and resentment of closures. Effective communication and public understanding must be stressed during the planning process.
The BLM must provide maps of accurate scale and suitable working materials for appropriate documentation for successful consultation with government representatives.

The BLM should provide maps and GIS shape files of all BLM special areas and other areas pertinent to planning, such as areas of ongoing regional ecological assessments.
The RMP should adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e., fish and wildlife populations, habitat and ecosystem conditions).
The RMP should emphasize landscape and ecosystem management that allows flexible use of our wildlands such that desired qualities are sustained indefinitely, with a careful eye to minimizing cumulative impacts that are non-sustainable. The RMP should be very conservative in the amount of degradation and resource consumption allowed.
Given the size of the planning area, it is important to view this large planning effort on a national scale. Local concerns are very important, too, but our federal lands should be managed primarily for the long-term benefit of the American people as a whole, including future generations, and we should assume that future Americans will desire many of the same qualities and opportunities that we prioritize today. Nationally, environmental protection in Alaska including wilderness, wildlands, recreation, wildlife, and frontier qualities has become a widespread public concern, and we can expect it to grow increasingly so over time. The wild, natural, and remote qualities that exist across much of BLM's Central Yukon Planning Area are becoming ever more valuable and sought after by Americans. They are also valuable to many Alaskans, for whom a subsistence lifestyle, or subsistence activities such as hunting are an additional reason to preserve much of the existing land character.
Wildlands, wildlife, subsistence activities and sustainable use of renewable resources are all values that can be managed to provide lasting benefit to the American people, including Alaskans, and the BLM has a unique niche among federal land managers to provide distinctive, sustainable multiple use management. To do so, it is critical that BLM planners differentiate between sustainable uses and non-sustainable uses, and compatible versus non-compatible uses.
The BLM must prioritize the management of the land in a combination that will best meet multiple use and sustained yield mandates. The priorities of primitive management areas, Areas of Critical Environmental Concern, Research Natural Areas and Wild and Scenic River Corridors must be reviewed for their impacts to these special designations – with mitigation measures and protection in mind. The best combination of uses must put the natural and wild environment before development in designated areas and critical habitats.
While the BLM follows a multiple use mandate, uses of areas should be inter-compatible and congruent with the purpose for which the lands have been designated as public lands. This is particularly true when considering uses that will irrevocably alter and diminish existing qualities. We can always decide in future to open wildlands to mining, or reduce stipulations that protect caribou calving habitat, but we cannot easily or quickly reverse these changes after degrading uses or less-restrictive management has been implemented. In some cases impacts are irreversible.
The BLM must look at the entire landscape and develop a management plan that accommodates the diverse needs of the public land users while balancing between the needs for economic development and sustainable resource conservation. The needs of subsistence users, non-motorized recreation, scientific, scenic, historical, ecological, environmental, air and atmospheric water resources, and archeological resources must be balanced appropriately with motorized recreation and sensible development.
Any proposed language in the RMP for multiple use areas that does not fully support multiple use is inconsistent with directives from Congress, the needs of the public, and should be dropped.
The RMP should ensure that existing sustainable economies of recreation, sport and commercial fishing, subsistence, and hunting are all prioritized for the lands managed by the BLM.
The RMP should be clearly describe enhancement programs for fisheries habitat and wildlife.
The BLM should consider the concept of multiple use in the Central Yukon RMP.
The BLM should consider opening more land opened to mining and natural resource development.

Trails within the planning area serve multiple uses for many stakeholders (e.g., transportation, recreation and trapping) and need to be maintained and managed so they can continue to be used. Local residents are willing to maintain trails if that is allowed. Trail rules should be consistent across the various land ownerships, so people using the trails don't need to worry about whose land they are on. Certain areas should be designated for recreational use. Some communities prefer not to be connected to the road by trails.
Additional Proposed Planning Criterion: All components of an individual alternative must be complementary." (BLM Land Use Planning Handbook: Section III.A.5)
One of the planning criterion listed in the Preparation Plan (Sept. 2012) is "Valid existing rights will be recognized and protected." Valid existing rights includes R.S. 2477 rights-of-way and 17(b) easements.
Another planning question that should be considered is "What criteria will be used to assess vulnerability to soil, vegetation and aquatic resource impacts from OHV (different sized OHV) use?"
The BLM should consider a new way of engaging remote rural communities. In addition to in-person meetings, the BLM should explore maximizing electronic communication including email, webinars, Facebook and local radio (there are 26 Alaska Public Broadcasting stations) or Alaska Rural Communication Service channels for outreach to remote rural Alaskan communities. Cell phone communication is highly utilized in many rural communities and it is possible electronic communication could be effective.
The BLM should make GIS staff and data available to assist the public with mapping information and comments on the Central Yukon RMP.
The BLM should allow public input into the management situation analysis, planning issues, and preliminary alternatives prior to preparing the draft RMP. These are all steps that other BLM offices have taken. The BLM may also want to hold workshops and solicit public comments on preliminary alternatives.
The process should include methods of public involvement that effectively reach motorized visitors and methods to account for the needs of citizens who may not participate for diverse reasons. Some public involvement methods that would be effective include: (1) the use of trail rangers (who are motorized enthusiasts) to count and interview visitors using the travelways and distribute Travel Management materials to them; (2) publication in the newsletters of motorized association; (3) attendance at motorized club meetings; (4) posting of information packets at motorized trail head areas, and (5) mailings to OHV enthusiasts and owners.
Due to the extended length of this RMP and the remote nature of village participants the BLM should provide extended comment periods on both the draft and the final RMPs. We understand the limitations of the BLM, but hope that the spirit and intent of NEPA will be honored and the highest public participation be achieved during this process.
The BLM must account for the remote nature and unique situations of each Tribal village to allow for delivery and review of planning documents so that meaningful meetings between governments can occur and in-depth comments can be created.
Because of the complexity of the issues and the probable length of the EIS, summary materials should be developed which, along with the full EIS can provide a resource to tribes to adequately participate.
The BLM should make use of available opportunities to give presentations about the planning process at forums including, but not limited to: Federal Subsistence Regional Advisory Councils, Alaska State Fish and Game Advisory Committees, the National Park Service Subsistence Resource Commission, and the Yukon River Panel.
The purpose and need for the RMP should include subsistence and recreational use. Portions of BLM-managed lands in the planning area are critical subsistence use areas. For example, BLM-managed lands near Hughes, Ruby, and Wiseman are important subsistence resource areas. The lands near Tanana are important for travel between villages. The Dalton Highway Corridor lands are prized caribou and sheep sport hunting areas. Many of the rivers, streams, and creeks are important fish habitat and subsistence fishing areas. Moose, furbearers, waterfowl, and other resources in the planning area are critical or core subsistence resources.

The BLM's Rapid Ecoregional Assessment, led by the University of Alaska Natural Heritage Program for the planning area will undoubtedly provide essential information to the draft RMP. The BLM should make every attempt to strategically improve outreach to remote rural communities and encourage the public to participate in the draft RMP by providing Rapid Ecoregional Assessment information and GIS files online.
The current Central Yukon RMP, Utility Corridor RMP and the Southwest Management Framework Plan prescribe an abundant need for science and monitoring that do not appear to have been completed. We hope that this next RMP will allow for some of these needed studies with priorities on climate change impacts and recommendations for dealing with a changing environment.
The RMP should provide strong protections for water and subsistence resource values. Prioritizing and protecting these resources will help preserve the character and biodiversity of the planning area and still allow for development in suitable areas.
Please consider strong protective management for the Central Yukon Planning Area. We live in a time of uncertainty for our landscapes and the animals that rely on them. Further, people living in the area depend on the land and animals so as we look into the future of these planning areas a long-term conservation strategy will serve our public lands better than a short-term mining or oil and gas development investment.
Please keep the mining and the petroleum industry out of the Central Yukon Planning Area, along with associated infrastructure such as road construction. These areas need to remain remote to keep indigenous way of life intact and to protect the wildlife that subsistence users depend on.
The things that make Alaska attractive to educated, working people are the wild lands which allow hunting and fishing, wildlife viewing, camping and hiking in ways that nowhere in the lower 48 do. We must guard these lands and waters or Alaska will become just a cold netherland with little to attract the very people we need here.
We must consider our way of life here in Alaska instead of always trying to dig it up, cut it down or otherwise change our State. The BLM should be protecting our land, its wildlife and the inhabitants, not laying waste the land to the highest bidder.
Areas of concern to the Venetie Village Council include: moose, caribou population and habitat protection, subsistence resource use prioritization over mining, oil and gas exploration and development invasive plant species, salmon and resident fish species, habitat protection and potential right way corridors for resource development.
If the BLM develops subunits for planning purposes, comments expressed support for including the Kanuti National Wildlife Refuge in the Utility Corridor Subunit. This refuge is relatively close to the Dalton Highway and thus is likely to experience road-related adverse impacts. Also because of its geography and proximity to Evansville Village Corporation Lands, Bettles should be in the Dalton Subunit.
The Central Yukon RMP/EIS should be organized and written in such a manner as to ensure clarity and participation. Our organizations recommend that four separate EISs (or one EIS separated into individual volumes for each area) should be printed and distributed, as well as four separate summaries including map sets in each. This will increase clarity and organization of materials, and aid in effective public involvement as well as prevent violation of agency mandates.
The BLM has elected to combine what was originally two separate planning areas (each with its own plan) and one unplanned area, into one large RMP/EIS with potentially four separate Records of Decision. Our organizations are concerned about the layout and readability of the draft and final documents. These distinct areas each have special management needs and objectives based on their designations. For the BLM to meet the requirements of the NEPA there will have to be: 1) An identified purpose and need for each planning area; 2) A review of three alternatives for each of the planning areas – resulting in 16 total alternatives for review; 3) Four “affected environment” analyses, one for each planning area; 4) Four “environmental consequences” analyses, one for each planning area; 4) Four summaries for each of the separate areas; and 5) Four Records of Decision. The end result of meeting these statutory obligations will be a cumbersome environmental impact statement (EIS) on a scale that is unreasonable for the public, tribal authorities, organizations and State and federal agencies to have to analyze, understand and comment upon.

Alatna and Allakaket oppose the Kanuti River being included in Dalton Highway Corridor subunit. These communities would be out-numbered and their comments would not carry as much weight if combined with the Dalton Highway Corridor subunit.
The BLM must require management practices that are necessary and appropriate to prevent unnecessary or undue degradation of the land, its resources and the environment, and to avoid adverse impacts to or attain the least adverse impact possible.
The BLM should post planning-related evaluations and analyses on the Central Yukon RMP website as soon as they are available including: evaluations of nominated Areas of Critical Environmental Concern; evaluation of Lands with Wilderness Characteristics; and analysis of comments submitted on the Draft Plan. Making such analyses available to the public before the publication of the Draft RMP/EIS will better prepare participants to understand the complex analyses and large amounts of data and increase the relevance and usefulness of comments and other public participation. We hope to see these types of opportunities provided to the many members of the public who are interested in the development of the RMP.
The BLM should identify cooperating agencies and post this information on the planning website.
The BLM should give greater weight to comments from communities that experience impacts from the Dalton Highway, either through spread of invasive weeds or through increased visitors or hunters who gain access to hunting areas by the road.
The BLM should consider creating a working group or become more closely involved with an existing working group for current and future management, monitoring and studies. We suggest the following local Native and international authorities/commissions: 1) Yukon River Drainage Fisheries Association; 2) Yukon River Panel; 3) Yukon River Inter-Tribal Watershed Council; 4) Council of Athabaskan Tribal Governments; 5) Inupiat Community of the Arctic Slope; 6) Tanana Chiefs Conference; 7) Maniilaq Association; 8) Individual Tribal Governments; 9) Norton Sound Watershed Council; 10) Alaska Native Science Commission and 11) Porcupine Caribou Management Group.
The Western Arctic Caribou Herd Working Group should be involved in the implementation of the BLM's Central Yukon RMP. Cooperation is a primary objective of the WACH Cooperative Management Plan, and the following strategies and actions would ensure strong partnership between the BLM and the Working Group towards shared goals: Formal recognition within the RMP of the Working Group as a forum to facilitate communication and coordination among parties concerned with management of the herd; encouraging interagency cooperation of herd management through a commitment within the RMP to participate in the Working Group Technical Committee, including sharing and reviewing studies and surveys being conducted on the herd and evaluating progress toward meeting information gaps identified by the Working Group; Integrating traditional ecological knowledge from Working Group members and other residents observing the WACH and caribou habitat into management plans and future decisions.
The BLM should standardize the websites for the Central Yukon, the Bering Sea-Western Interior, and the Eastern Interior RMPs so that there are similar mapping opportunities and terminology used is the same.
The public expressed some frustration with the total amount of BLM-managed land and BLM's authority to manage the public's use of resources in the State of Alaska.
The Dalton Highway Recreation Plan should be revisited because we have seen issues like the use of public resources used for commercial purposes since it was written. Also the public process for the plan was inadequate because they did not meet in the affected communities such as Wiseman when the plan was being written.
We would like the environment to remain the way it is now. The BLM should put everything on hold for the next 30 years to protect our way of life until we figure out how our people can live, because our way of life is being affected; some lands are open to mining but we don't necessarily know it yet because it hasn't yet been developed. There would a big impact to subsistence users if resource development impacts subsistence. We do not have money so we live off the country. We'd all end up on welfare if subsistence activities are compromised and nobody wants that.

The existing plan is doing well and I'd like to see the salmon spawning and the protection of the Tozitna River and a few special areas like RNAs. I don't think drawing attention to it by making it a "wild and scenic" area is a good idea.
If it ain't broke, don't fix it applies to around Tanana. Maybe a better inventory of what lies within the area would be beneficial, both renewable and non-renewable.
<p>The BLM needs to explain the following:</p> <ul style="list-style-type: none"> • What is the Governor's Consistency Review and is it in addition to their role as a Cooperator? • How is the RMP going to be monitored and enforced? • Does the RMP have anything to do with the enforcement of State and federal laws by BLM rangers?
Tanana Village (Tozitna Tribe) owns some land adjacent to BLM-managed land. Tozitna Tribe is working on its Tribal resources management plan which contains issues such as trespass, protecting resources for traditional use by tribal members, and introduction of wood bison. The RMP would affect this planning effort and the BLM should coordinate with the Tribe.

A.19. Recreation

Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by the RMP.
What are the current regulations for building cabins on BLM-managed lands for subsistence use or trapping? It would be helpful to align USFWS and BLM policies on building cabins. The RMP should allow for the use of existing cabins and construction of new public use/shelter cabins for all recreational activities including specific seasonal activities such as trapping. All trapping rights and privileges should be continued in this region.
The RMP should maintain opportunities for solitude, primitive recreation, and identified special features in the Central Arctic Management Area.
Dispersed campsites should remain open. If water quality concerns are the basis for closures, there are reasonable alternatives to mitigate these concerns, such as allowing only self-contained camping units to use them. Additionally, a sense of magnitude needs to be applied when assessing the water quality impacts from camping.
There is a very high demand for campsites and especially dispersed campsites. If a dispersed campsite is closed, then the closure should be mitigated by creation of new campsites on at least a 1:1 basis in order to avoid a significant cumulative effect on the public of too few campsites.
The RMP should provide and/or allow for the development of parking sites, camping opportunities, and boat launches along all transportation corridors, with a priority emphasis along the Dalton corridor, in meeting recreational user demands.
If dispersed campsites are to be closed based on water quality concerns, then the decision should include a water quality monitoring program to establish the baseline water quality prior to the closure of dispersed campsites and continue that program after the closure to establish whether any significant water quality improvement was realized. The decision should also include a provision to re-open closed campsites when no significant improvement in water quality was realized by the closure.
Request for a campground at the Yukon River.
Agencies are encouraged to coordinate to establish uniform rules, standardized signing, and OHV census collection points at road and trail collection points.
The Utility Corridor should be managed with an emphasis on recreation due to the accessible nature of the Dalton Highway.
The BLM should analyze issues around the question: How well have the goals set out by the agency in its Dalton Highway Recreation Area Management Plan (BLM 1991) been achieved?

The BLM should analyze issues around the question: How will recreational users within the [Dalton] corridor be affected by noise, traffic, loss of scenic values and wild lands qualities, disturbance of wildlife, crowding, loss of camping sites, disruption of scenic views, and permanent, irretrievable loss of wild lands, natural, and semi-primitive recreation uses?
The BLM should analyze issues around the questions: What are the existing levels of services in the [Dalton Highway] area, what are their costs annually, and how are they funded? How will they be funded along the Umiat Road and at the Umiat airport?
<p>The public was both in support of and opposed to the construction and maintenance of additional infrastructure provided by the BLM on the Dalton Highway. The RMP should consider the following issues concerning the Dalton Highway corridor:</p> <ul style="list-style-type: none"> • There should be no guiding on the Dalton Highway Corridor. • Enforcement of hunting regulations is necessary even though it is a very large area to enforce. • Increasing the number of pullouts and waysides along the highway would detract from the "undisturbed places" and quality of scenery that travelers along the highway come to experience. • Hunters are using the pullouts and waysides to stage their hunting activities along the Dalton Highway leaving trash and hunting debris and limiting the use of these areas for other users. • Build rest areas along Dalton Highway and more clearly marked roadside camps are needed. • Planning for the Dalton Highway needs to include a variety of users groups that may conflict with one another. • Consider discouraging the use of interpretive signs past a certain northern point of the Dalton to limit the number of people going to this area. • Add more bathrooms along the Dalton Highway.
Ongoing visitation and light resource users will benefit from a corridor managed for sustainability, as well as locals, and this will also be economically more advantageous for all into the future.
Agencies are encouraged to provide good statistics on the level of use by the various public land visitors and use these statistics in the decision processes.
Agencies should standardize or simplify seasonal closure dates as much as possible.
To ameliorate resource impacts, the BLM should develop the opportunity for resource users to disperse with the use of low impact modes of transportation and seasonal all-terrain vehicles when and where practicable.
Educational measures should be incorporated as part of this proposed action and the cumulative negative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities should be addressed.
The State's primary recreational interest in BLM-managed lands both State-selected and nonselected, is continued access for both motorized and non-motorized uses for a wide variety of recreational uses, including the access method itself. Equally important is management of these lands so that the land is not subject to damage by such use. The State's goals and objectives relative to recreation can be found in the 2009 Statewide Comprehensive Outdoor Recreation Plan, State Area and Management Plans and Generally Allowed Uses on State land should also be considered in developing management recommendations for State-selected land and federally owned area adjacent to State lands.
Agencies are encouraged to develop OHV programs that address more than law enforcement needs. OHV programs should actively promote the development, enhancement, and mitigation of OHV recreation opportunities.
New commercial big game hunting (guiding) permits should be restricted or eliminated due to over saturation of users creating negative experiences for clientele. The BLM has already issued for too many permits, especially within and extending out from the Dalton Highway corridor. Any additional permits will further degrade the quality of experience and have a profoundly harmful effect on the wildlife resource.

A suggestion was made that the BLM could evaluate in the RMP a selection process for guides similar to the one the State is working on. In 2004, the BLM said the RMP would contain a guide selection process to limit the number of guides in one area and the number of animals they could take (guide capacity). The qualifications process for this should be clarified as the State process allows qualified guides to sell their permit to unqualified guides. A drawing for qualified guides would be useful to consider.
The evaluation should recognize the tremendous value of OHV recreation for both mental and physical health benefits used this information to justify an increase in motorized recreational opportunities.
The RMP should disclose visitor health and safety, user conflicts, and resource protection issues. The RMP should clearly identify management, monitoring, and administrative report actions.
The need for more non-motorized hiking trails has not been demonstrated or documented.
Continue to manage uses of the Historic Trail within the guidelines of the current Comprehensive Management Plan.
Travel Plans and visitors maps should be the same. This combination map should include as much detail as possible (such as contour information) so that the public can better determine the location of roads and trails that are open or closed.
Agencies are encouraged to make Travel Plan maps more readily available. Vending machines could be placed in areas that are accessible at any time of the day or week at the BLM and FS offices.
User conflicts have decreased the quality of the motorized recreational experience.
Summary statistics from the National Survey on Recreation and the Environment are skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation and if they are added together they are as large as any other group in the survey which correctly demonstrates the magnitude of motorized recreation.
Resource allocation must include access to an equal number of quality recreational opportunities including alpine lakes, rivers, streams, and overlooks.
Adequate motorized recreational opportunities are needed, especially within a short distance of the cities and towns in the planning area. All reasonable OHV routes should be located within short distance of urban areas be developed and that urban OHV trail heads be developed where ever public right-of-way allows access to public land.
The public has a need for more motorized access to dispersed camping spots in the project area including access for RVs trailers, and tent camping.
The cumulative negative impact from concentrating visitors to narrow corridors will result in poor management of public lands and unreasonable access to public lands and recreational opportunities. The BLM should evaluate the cumulative negative impacts from management goals that tend to concentrate visitors to narrow corridors and reduce recreation opportunities for motorized visitors.
Analysis and decision-making should fully recognize all of the activities served by motorized use and the cumulative negative impact that closing roads and trails have had on all multiple use recreationists.
Sound level should not be used as a reason to justify motorized recreation and access closures.
Concern with sound levels can be mitigated by establishing a reasonable decibel limit for exhaust systems. Public land-use agencies could establish reasonable sound limits and use this approach to address the sound level issue. This alternative would be more equitable than closures. The BLM should incorporate this reasonable alternative to motorized closures into the preferred alternative and decision making.
Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, (i.e., wilderness areas).

It appears that the BLM corridor through the Brooks Range is rather narrow and abuts national parks on both directions. Hopefully these BLM areas remain open for recreation so that hikers/skiers/visitors can easily leave the road and get out.
Allowing travel up to 300 feet off of a designated route, both roads and trails, is an absolutely necessary opportunity for reasonable use of the area by the public. This access is needed for retrieval, woodcutting, and to reach dispersed campsites and the public's use of the area would be unreasonably compromised without this access. The use of this access can be qualified to restrict it in situations where it results in unreasonable resource damage.
The Central Yukon Draft EIS must include the evaluation of a pro-recreation alternative so that motorized recreationists do not end up losing before the process begins. A true pro-recreation alternative should be based on the actual usage of the area which is 99% motorized multiple use in the case of the planning area.
An important component of a revised RMP should be a soundscape plan that describes the current situation, provides for ongoing monitoring, and takes steps to protect the natural sounds and quiet that presently exist and to restore natural sounds and natural quiet to appropriate portions of the planning area where those resources have been degraded or lost.
The RMP should ensure that quiet recreation opportunities are given sufficient attention and that management of motorized recreation, in general, is also designed to protect the experiences of other public land visitors.
Tourism would benefit from a road to the Arctic Ocean.
The Recreation Opportunity Spectrum (ROS) for motorized recreationists should consist of an equivalent number, type and quality of opportunities as compared to non-motorized recreationists including access to back country recreation areas, long distance backcountry discovery routes, backcountry airstrips and destinations including historic areas, lakes, vistas, streams and rivers.
The boundaries of primitive and semi-primitive areas should be maintained.
There should be a continued focus on the undeveloped recreation tourism market. A focus on the undeveloped market requires a Special Recreation Management Area designation.
The preferred alternative must provide for an adequate number of routes as required to provide access to the many historic mines and cabins and an adequate number of dispersed campsites and trail heads.
Are there places in the planning area where interpretive signs will detract from people's experience and should not be constructed?
Agencies are encouraged to correct the signing at trail heads that suggests that motorized visitors are more damaging than other visitors.
The RMP should evaluate the impacts of tourism and recreation in the planning area among different user groups. In the Lake Minchumina area there is some fly-in tourism because some "hardy" tourists are attracted by the open space for recreation.
Conflicts between air transportation of commercial and local guides and increased levels of air traffic were noted as a concern during scoping. A commenter in Nulato noted that this area is a controlled moose area and it has an intensive moose management plan with commercial air transporters being locked-out of the area but private hunters are not locked-out; fly-in hunters can arrive by private planes and hunt moose in the area that is a non-guide area. At Wiseman a commenter noted that air taxis are a problem as they are unregulated and can drop off hunters where the herd is and hunter transportation should be evaluated in the plan. Another commenter noted that the float ponds concept was not a desirable use of BLM-managed lands.
Commenters expressed concern and asked for clarity on the process of obtaining trapping licenses on BLM-managed lands and establishing base camps. The RMP should address the impacts of road construction or mining that could conflict with trapping.

The BLM should clarify the categories of casual use on ROW trails and what type of vehicle travel requires a permit or not. One resident thought the Bettles-Evansville winter road seemed to work so they do not want to see it change in the new RMP.
The BLM should also examine the relationship of seasonal traffic over trails that border BLM-managed lands and the USFWS Kanuti Refuge lands because these agencies have different inter-village travel rules. Commenters noted they did not feel that the Kanuti Refuge has the right to ban travel at the very edge of their refuge on a public and traditionally-used trail that should be still open to snowmachines.
The BLM should include a reasonable definition for “significant” conflict in the RMP. Whether or not there is a user conflict or not depends primarily on user attitudes.
The BLM should incorporate each of the 12 principles for minimizing conflicts on multiple use trails (National Recreational Trails Advisory Committee) into the travel management plan.
Limiting general user days is usually not a viable option for managing user conflicts in rural Alaska.
The BLM should use the least restrictive tool to address user conflicts including education, voluntary registration systems, and enforceable stipulations for commercial operators. Planning decisions should be adaptive to changes of resource use at different scales.
The RMP should consider removing road-accessible areas for commercial guiding so wildlife viewers/photographers don't encounter hunters. There should be more road accessible lands withdrawn from commercial guide use areas
Agencies are encouraged to provide good statistics on the level of use by the various public land visitors and use these statistics in the decision processes.
The current trend of excessive motorized access and motorized recreational closures is having a significant impact on the number of visitors to the forest. This trend has created significant issues in regards to adequate public access and adequate motorized recreation which much be analyzed adequately during the process.
A reasonable approach to the assessment of equal recreational opportunity would use a comparison of acres and miles of trails per non-motorized visit versus acres and miles of trail per motorized visit. An equal number of acres and trail miles per visit should be the goal.
If Issue A7 ("How can the BLM best manage competing recreational and subsistence uses of resources?") from the Issues and Planning Criteria document is carried forward to the RMP, we request the following change in order to only reflect the subsistence uses within BLM's authority: How can the BLM best manage competing recreational and subsistence uses of vegetation resources?
The BLM should consider removing the Dalton Highway Corridor through the entire Brooks Range section from possible commercial guiding, and other serious environmental detriments (large scale mining operations, roads, trails, etc.), and allow only those impacts that relate to the original purpose of Corridor; running pipelines.
Manage permitted guides to include quality of hunts. Currently, there are too many guides permitted in the Dalton Highway Corridor.

A.20. Soil Resources

The BLM needs to consider how to correct issues (erosion, sedimentation, wetland degradation) related to access off of the Dalton Highway.
An adequate sense of magnitude must be employed within the analysis and decision making. For example, the total naturally occurring loss of soil from the Cibola National Forest is estimated to be on the order of 1,577 acre-feet per year. The loss associated with OHV use is on the order of 52 acre-feet. Soil erosion associated with OHV recreation is relatively insignificant compared to the naturally occurring erosion rate acceptable for multiple use lands.

Hiking, horseback riding, cross-country hiking and wilderness uses also causes soil and trail impacts as evidenced by many studies (Forest Service INT-450 1991, Park Science 14(4) 1994, Montana Research and Development 14(1) 1994) yet these impacts are seldom acknowledged. If the issues surrounding motorized travel are significant enough to justify closures, then, in order to avoid introducing a bias to the evaluation and process the same issues and restrictions should also be applied to hiking, mountain climbing, cross-country hiking, wilderness users, etc.

The RMP should recognize the increased rate of thawing permafrost related to climate change, and develop criteria for the design, engineering and operation requirements for mines and associated infrastructure located on permafrost to ensure stability of mine features, particularly for tailings ponds and other facilities that must be managed in perpetuity. The RMP should also stipulate a rigorous, long-term monitoring plan for detecting the disruption of permafrost, and any associated effects. Water management system must have adequate storage capacity during operations and closure under all climatic conditions, including potential long-term changes in permafrost. Water storage requirements could have impacts on geotechnical stability of the main tailings dam and ground and surface water resources.

Understanding how much of the Central Yukon Planning Area is underlain by permafrost is critical. The RMP should include plans for better understanding permafrost and soils, seek funding for such surveys, and ultimately incorporate this information into land use planning.

How will the BLM address the increased risk of thawing permafrost, when managing mine operations, and associated infrastructure, on public lands? Considering the effects of climate change, mine facilities, particularly tailings ponds and other waste containment structures that must be maintained in perpetuity, are at significant risk of long-term failure if located on permafrost that is vulnerable to temperature change. Early detection of permafrost disruption is critical in avoiding catastrophic failures.

The following potential significant impacts associated with permafrost melting should be considered: Seepage from the tailings dam may increase substantially if permafrost does not exist as a confining layer; Groundwater may rise to a level where upwelling of groundwater into the tailings impoundment may occur; Groundwater flow into the pits might increase substantially because the interconnectedness of water-bearing fault blocks and fractures in the bedrock would be much greater without the presence of permafrost; and Pit de-watering activities would impact larger areas surrounding the pit and cause a more extensive drawdown cone, possibly influencing stream and spring flows in the project area.

The environmental document should accurately address the significant negative impacts associated with disturbing existing stable roadways in order to obliterate the existing roadbed. A reasonable alternative would be to reclassify the road to either restricted-width or unrestricted-width motorized trail. The preferred alternative should make practical use of this management tool and the benefits that it provides including reduced impacts of sedimentation, to fisheries, from noxious weeds, not to mention, lower construction cost, reduced road inventory, reduced road maintenance and increased opportunities for motorized recreationists.

Watershed restoration and road decommissioning are designed to decrease sediment loads to fish-bearing streams over the long term, however, within the first few years of heavy equipment work, sediment loads commonly increase.

There are many mitigation measures that can be employed to reduce soil erosion on roads and trails while still allowing the public to enjoy them. For example, installing water bars and sediment traps are effective ways of reducing sediment discharge.

Sediment production associated with motorized recreation cannot begin to compare to the magnitude of sediment produced by wildfires. Therefore it is not reasonable to use sediment as a basis to close motorized recreational opportunities when impacts from "let it burn" and other management policies are a million times greater and considered acceptable.

The Forest Service Stream Systems Technology Center has found (Stream Notes July 2000) that roads and trails can easily be hydrologically disconnected from streams. Therefore, the sedimentation concerns can be easily mitigated and should not be used as a reason to justify motorized recreation and access closures except in exceptional cases that cannot be adequately mitigated.

The transport capacity of project area streams must be established and compared to the amount of historic sediment transport to determine if there is any additional capacity to transport the increased amount of sediment predicted by the project. This basic check should be conducted so that the increase in sediment production and associated negative impacts are not over-estimated to the disadvantage of public use and motorized recreation.

A.21. Special Status Species

The BLM should develop a comprehensive suite of management prescriptions for each special status, threatened and endangered species, or rare and imperiled species within the planning area. Such prescriptions must be consistent with the goal of maintaining and increasing populations for these species. Key habitat for each species should be identified and in these areas the management emphasis would be on protecting the species and any uses inconsistent with this goal would be prohibited.

The BLM should incorporate the science and management recommendations in the U.S. Fish and Wildlife Service's draft raptor guidelines and rare plant Best Management Practices into the Draft RMP sections on managing rare plants and raptors.

The Draft RMP/EIS should identify any endangered, threatened, and candidate species under Endangered Species Act (ESA), and other sensitive species within the planning area. For each species, the RMP should: describe the critical habitat for the species; identify any impacts RMP activities will have on the species and their critical habitats; and how the RMP will meet all requirements under ESA. The RMP should summarize required consultation with the U.S. Fish and Wildlife Service or the National Oceanographic Atmospheric Administration. It may be useful for the RMP to include summary of the draft biological assessment and a description of the outcome of consultation with the Services. The RMP's actions should promote the recovery of declining populations of species, especially those critical to subsistence.

A.22. Travel Management

Agency staff should not use motorized access in areas closed to motorized access by the public because: 1) the public will see the tracks and could become upset that the motorized closure is being violated; 2) the public will see the tracks and conclude that motorized access is acceptable.

At least one alternative in the RMP should maximize motorized recreation opportunities in the planning area and should strive to provide for current and future demand for recreational OHV routes. This should include opportunity for construction of new trails as demand increases.

An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, mountain bikes, and four-wheel drive vehicles. Such an alternative should also include the designation of a reasonable network of dual-use roads to allow inter-connection access to OHV recreational resources. The quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. A reasonable alternative should also consider a trade of the closed motorized route for a motorized route of equal opportunity and value in a different location.

The project team should develop management alternatives that allow for proactive OHV management including provisions to mark, map and maintain designated roads, trails and areas in cooperation with OHV users.

All alternatives should include direction to engage in cooperative management with OHV groups and individuals.

It is obvious from aerial observation of the project area that under the existing conditions much of the area is inaccessible to motor vehicles and that the existing level of motorized access and motorized recreation is entirely reasonable.
Protect special areas with “limited” or “closed” designations and continued “open” use in currently designated open OHV use areas.
A "closed" area designation may be appropriate in some areas to minimize damage to soil and vegetation.
There are no compelling reasons to close as many motorized access and motorized recreational opportunities as has been proposed by the BLM. It is simply contrary to the public need and the way that the public has historically used all multiple use areas in the Central Yukon project area.
The Central Yukon Planning Area has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to “explore” closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience.
The analysis should consider the footprint of existing and proposed routes as a percentage of the total size of the planning area. For example at a typical width of 48 inches, 7 miles of ATV trail cover about three acres. The total acres impacted by existing routes is likely insignificant given the size of the planning area.
The alternatives formulation and decision making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities.
Studies in other areas have found that the numbers OHV owners is increasing. This analysis also needs to be done in the Central Yukon project area. Such a study will likely find a similar growth trend and that a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth.
It is not environmentally or socially responsible to squeeze motorized recreationists into the small possible number of areas and routes. Motorized recreationists enjoy dispersed recreational opportunities. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes.
To be legally defensible the following two tests must be used to identify any proposed motorized route closures: 1) the proposed closure of a motorized route must be based on site-specific data and documentation of actual significant impacts caused by motorized recreation; and 2) the documented impacts from motorized recreation must be substantially more significant than naturally occurring events.
Recreational opportunities for motorized recreationists is being reduced to a limited number of motorized routes and the lesser used routes are becoming hard to find. The most valuable motorized routes now days are the ones that are remote and see less use. Barely visible 2-track roads and single-track trails are invaluable to motorized recreationists due to the quality of experience they provide. At the same time, these are the routes most likely to be proposed for closure.
The current management trend of motorized closures at every opportunity is not in the best interest of the public and the environment in the long-term.
The RMP should recognize that: the public wants the existing roads and trails left open for use; a recreational trail system should be developing using the existing road network as a starting point; mitigation should be considered instead of trail closure; the RMP should consider displaced use and consider alternatives that properly manage displaced use; the plan should be flexible enough for the BLM to respond to changing conditions.
Eliminating opportunities does not solve problems. A more reasonable approach is to maintain recreation opportunities by addressing problems through mitigation measures such as education, signing, seasonal restrictions, user fees, and structural improvements such as water bars, trail re-routing, and bridges. There may be problems with certain motorized roads and trails, but we should work to solve and mitigate them and not to compound them by enacting more closures. The BLM should consider using mitigation and education as a means to address problems rather than closures.

Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important. The RMP should preserve all reasonable existing motorized opportunities.
The State is concerned about protecting continued access to State-owned and State-selected lands and waters as well as federal public lands. However, we share the BLM's interest in considering management options that reduce, prevent, or mitigate impacts from OHV use in sensitive areas such as wetlands, stream crossings, and important wildlife habitat. We encourage the BLM to work with the State to determine traditional routes of access and protect sensitive areas.
Some areas of State lands identified by the Alaska Board of Game (Board) have vehicular use restrictions related to the harvest of fish and game. Annual Alaska Hunting Regulations describe vehicular restrictions for hunting by Game Management Unit. The Board generally addresses OHV management issues in these areas.
The RMP should identify and close to motorized recreational use (e.g., ATVs, snowmachines, airboats, jet skis, helicopters, fixed-wing planes) a substantial portion of the BLM-managed lands within the planning area. Two types of closures should be made: those that protect lands and waters that are important for ecological values like fish and wildlife and their habitat, clean air and water, natural sounds, natural quiet, soils, and vegetation; and those that are important for social/conservation reasons like scenic beauty, wilderness character, and quiet recreation. These closures are becoming increasingly necessary with the "increased use of off-highway vehicles" in the area.
Planning, including travel management, should be a process to quantify and address the needs of the public for motorized access and motorized recreational opportunities. Instead, it is approached in just the opposite direction as a closure process that ignores the needs of the public for motorized access and motorized recreational opportunities.
The reason often given that motorized trail projects including those using OHV grant money cannot be undertaken is that there is a current travel planning process under way or one about to begin or that NEPA compliance must be undertaken. There is a continuous cycle of travel planning and the public is not able to undertake NEPA compliance. The result is that motorized RTP funding is often under-utilized. At the same time, there is a tremendous need to projects on motorized routes. We need to find a way to break this Catch-22 situation.
The travel management process should be initiated with the scoping process and a full and adequate evaluation of all viable alternatives. All existing roads and trails available to motorized recreationists should be used as the starting alternative for all analyses and impact determinations. Establishment of this baseline alternative is crucial to the evaluation of all proposed impacts on motorized recreationists.
The Bureau of Land Management National Management Strategy for Motorized Off-Highway Vehicle Use (http://www.blm.gov/ohv/OHV_FNL.pdf) required site-specific analysis as part of the route designation process. Motorized recreationists agreed to accept the rule on this basis. This project must meet the requirements for site-specific analysis. Site-specific analysis should adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. Motorized recreationists should be adequately queried as part of this site-specific evaluation process and that the conditions they identify be considered.
Non-system roads and trails are a significant OHV recreation resource. However, non-system roads and trails are, most often, not inventoried and considered in the travel management process. Failing to identify and consider non-system roads and trails in the travel management process will underestimate the existing use and needs of motorized recreationists and also impacts resulting from closure of these roads and trails.
The plan should identify any trail reroutes that are part of the travel plan proposal because the reroutes are often of lesser quality and the reduction in quality needs to be mitigated. Trails planned for rerouting should not be closed until the reroute is completed.
In areas where OHVs must use a roadway, travel management plans should include the designation of dual-use roads to allow OHVs to move from one trail segment to another.
The BLM must complete comprehensive travel management concurrently with the RMP process. The RMP should also identify priority areas for implementation of the travel plan.

<p>The guidance in the BLM Alaska Long Range Transportation Plan (LRTP) to exclude primitive roads and motorized/mechanized trails from the BLM transportation system in areas where lands with wilderness characteristics are protected would preclude maintaining transportation connectivity in the planning area. This exclusion would also prevent funding maintenance and improvements for the motorized/mechanized trails, and could have serious negative impacts on the transportation, economics, and social justice for this area. The RMP should include a comprehensive trail inventory and fully evaluate these impacts.</p>
<p>Motorized closures are being enacted incrementally and without adequate disclosure and consideration of the cumulative effects. Travel plans are created or revised every 10 years. If 25 to 50% of the existing motorized recreational opportunities are closed in each successive travel plan, then over the course of about 30 years in a given area, only 13 to 42% of the original motorized recreational opportunities will remain at the end of the third cycle. The Central Yukon Resource Management Plan should adequately recognize and address this trend.</p>
<p>Road decommissioning funds should be used to maintain motorized trails. Rather than being closed, roads should be converted to ATV routes. This expenditure would benefit the public and environment in a more positive way than total closures and have a positive environmental impact.</p>
<p>The cumulative negative impact of all closures on motorized recreationists are significant and to date these factors have not been adequately examined. The EIS must analyze the cumulative effect of any proposed motorized access or motorized recreation closure in combination with all other motorized access and motorized recreation closures in the state. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing.</p>
<p>In addition to considering cumulative effects to motorized users from past, present, and proposed closure of motorized routes, the RMP should include an adequate mitigation plan to compensate for inadequate consideration in the past.</p>
<p>The EIS must use a reasonable test of significance to analyze impacts to motorized recreationists. A reasonable test would include evaluation of the following indicators:</p> <ul style="list-style-type: none"> • Where else can motorized recreationists go within a reasonable distance and with equal recreation value? • Do motorized recreationists have an adequate selection of the recreational resources with the proposed motorized closure(s)? • What is the balance of recreational opportunities in the area and region? • Are the existing motorized recreational opportunities sufficient for the needs of the public? • Are there documented user conflict and can the recreational resources be reasonably shared? Note it is not reasonable to define user conflict as merely seeing someone else on a trail. • What are the cumulative effects of this motorized closure combined with all other motorized closures?
<p>Consider the cumulative effect of locked gates that now prevent public motorized access. This is an ever increasing issue that now significantly affects the public.</p>
<p>The cumulative negative effects of more restrictive travel plan decisions include the concentration of use on fewer miles of road and trail, such that traffic density is increased and recreation enjoyment is reduced.</p>
<p>Travel decisions that restrict motorized recreation in one area may consequently increase motorized use in another where travel plans are not yet in place. Cumulatively then, this "leapfrog" effect may increase resource damage, create more law enforcement problems, generate discord between motorized and non-motorized recreationists, and make future site-specific travel planning more difficult. This cumulative negative effect must be adequately considered as part of this project.</p>
<p>The plan should provide corrective action and an overarching mitigation plan that will undo the significant impact that all cumulative motorized access and motorized recreational closures has had on motorized recreationists over the past 35 years. Additionally, a monitoring program should be provided by an unbiased third-party to assure that this correction occurs within our lifetime.</p>

<p>The lack of accounting for the cumulative negative impact of all forms of motorized closures over the past 35 years is an undisclosed strategy to squeeze motorized recreationists into the smallest possible area. Once this is accomplished, then the agencies will take the position that the impacts on that small area left for use is significant and everything will be completely shut down.</p>
<p>Lack of information is a significant reason why motorized recreationists are suffering such significant reductions in recreation opportunity. Because data does not exist, agencies cannot quantify the individual and cumulative negative impacts of each motorized access and recreation closure on motorized recreationists. This cumulative negative impact be addressed by the collection of data and the fair evaluation of the need for motorized access and motorized recreation.</p>
<p>Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails and motorcycle single-tracks have far less impact than roads.</p>
<p>Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities in the Central Yukon Resource Management Plan DEIS project. Moreover, in order to be responsive to this growing public need, the travel management plan should allow for growth and enhancement of motorized recreational opportunities.</p>
<p>The existing five mile closure to off-highway vehicles along the Dalton Highway should be continued to protect both subsistence resources and a wide range of ecological and other social/conservation values. The BLM should continue to adopt State law which is stricter than BLM regulations.</p>
<p>Under State law, motorized access is prohibited within 5 miles of the Dalton Highway, with the goal of protecting subsistence resources across the North Slope. This 5-mile buffer zone makes it almost impossible for ATV traffic to cross the foothills because the buffer prohibits their entrance via the Dalton. But, by piercing that buffer zone, the Road to Umiat project would allow greatly intensified and unprecedented access by vehicles to the entire North Slope region west of the Dalton Highway.</p>
<p>The 5-mile buffer was legislated by Alaska statute, yet there have been at least two legislative efforts to remove the buffer zone in recent years. The BLM should establish its own 5-mile non-motorized buffer to ensure that the buffer continues to protect the high scenic, hunting, wildlife viewing, and recreational quality of the Dalton Highway corridor. This buffer zone is highly effective at protecting not only the near-highway resources, but also the more remote federal conservation lands far beyond it.</p>
<p>The 5-mile non-motorized buffer on the Dalton Highway contributes both to the high quality of my hunting and to my success in providing game for my family. Based on comparisons with other highway systems in the state, those who request easier, enhanced, and motorized-access are also asking for rapid deterioration of the conditions that make hunting here so rewarding. I've also accessed the Arctic Refuge and Gates of the Arctic Park off the Dalton Highway and view the road as an unparalleled recreational access—one not in need of enhanced access or improvements. Again, ease of access often works against the quality of one's recreational and hunting experience. Keep it wild, and you retain the rarest, most distinctive qualities.</p>
<p>The RMP/EIS must clearly disclose, using maps, tables, and summaries all existing areas, and existing roads and trails that would be closed to motorized access. Summaries should include overall closures percentages. Otherwise public disclosure has not been adequately provided, the public will not be informed, and the public including motorized recreationists will not be able to adequately participate and comment.</p>

<p>The following are examples of adequate OHV trail systems that should be used to guide development of this project:</p> <ul style="list-style-type: none"> • Danskin Mountain in the Boise National Forest; • South Fork Boise River in the Boise and Sawtooth National Forests; • Winom-Frazier in the Umatilla/Whitman National Forest; • Prospect OHV area in the Rogue River National Forest; • Paiute OHV System in the Fishlake National Forest; • Mendocino National Forest; • High Lakes and Blue Lake Trail System in the Gifford Pinchot National Forest; • Canfield Trail System near Coeur d'Alene, Idaho Panhandle National Forest.
<p>Forest fires have eliminated many motorized roads and trails. These losses have occurred due to deadfall, re-growth, and loss of trail tread associated with the forest fire. The loss of motorized opportunities from fires has become a significant cumulative impact and issue to motorized recreationists. This issue must be addressed as part of this travel plan. Mitigation measures to reduce this significant impact should be considered.</p>
<p>The BLM should consider the importance of OHV use for game retrieval. An off-trail allowance for OHV use for the purpose of game retrieval should be part of any alternative that limits OHV use to existing trails.</p>
<p>OHV recreation generates millions of dollars in OHV gas tax revenues which should be used for trail maintenance. Unfortunately, these dollars are not being applied to OHV trails. The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. A program similar to the Trails Unlimited program could be considered (http://www.fs.fed.us/trailsunlimited/). AmeriCorps type labor could also be used.</p>
<p>OHV recreationists have significant needs that have gone unmet for many years due to the lack of adequate funding. The lack of adequate funding and attention to these needs has also contributed to some concerns associated with OHV recreation. An adequate level of funding would address all needs and concerns associated with OHV recreation including environmental protection and mitigation projects, education and safety programs, the enhancement of existing recreation opportunities and, the development of new OHV recreation opportunities necessary to meet the needs of the public. The development of a funding mechanism that equitably returns gas tax revenues directly to OHV recreationists should be considered.</p>
<p>There are cases where OHV gas tax funding has been used to improve a non-motorized trail and also cases where OHV gas tax money has been used to improve a trail and then that trail has been closed to motorized use. The use of OHV gas tax funding for non-motorized recreation is improper. These cases should be identified and corrected by replacing motorized recreational opportunities that have been closed with new motorized recreational opportunities of equal recreational value.</p>
<p>Idaho's Trail Ranger program combined with cooperative management of National Forest lands provide over 9,000 miles of trail riding opportunities (http://www.idahoparks.org/rec/ranger1.html). This is an example of the level of OHV programs and recreational opportunities that motorized recreationists need in each state and we ask that this project adopt a similar goal.</p>
<p>The BLM should Inventory existing and designated trails and their condition to identify the level of degradation and prioritize stabilization activities. Once priorities are established improvement prescriptions and implementation must be put in place. Monitoring and maintenance should be a large part of the plan.</p>
<p>The BLM should properly document and identify designated trails and prevent the usage and proliferation of undesignated trails. Signs should be created and posted to designate trails and to educate the public on the importance of staying on trails, reporting degraded sites and holding others responsible.</p>
<p>Due to climate changes there are longer freeze and break-up periods where limitations may be necessary for both snowmachine and OHV uses to ensure that unnecessary damages are not incurred on public lands. This may include more strict weight limits, closures or visitor limitations to reduce traffic.</p>

Many handicapped, elderly, or physically impaired citizens can only access and recreate on public lands by using motorized roads and trails. The needs of these citizens should be adequately considered. The proposed action must adequately address and comply with the recommendations of the study conducted to address P.L. 105-359 (November 10, 1998) including items 1 and 7.
The interdisciplinary team should include motorized recreation planners and enthusiasts in order to adequately speak for the needs of motorized visitors. An adequate number of agency staff should be licensed and safety trained to operate OHVs, have an adequate number of OHVs for their use and spend an adequate amount of time riding OHVs along with OHV recreationists so that they can adequately understand the needs associated with motorized access and motorized recreationists. A multiple use and motorized recreationists advisory board could also be used to advise the BLM.
A system of dual-purpose roads, and OHV roads and trails that interconnect should be one of the primary objectives of the travel management plan. This objective must be adequately addressed in the document and decision. Two examples of such a system are the Great Western Trail and Oregon Back Country Discovery Route. This motorized network should be equivalent to trails available for non-motorized users such as the Continental Divide Trail, Pacific Crest Trail, National Recreation Trail and other national non-motorized trails that travel a long distance and interconnect public lands.
Where possible, provide trailheads for motorized trails that are located at the boundary of urban areas and trails that connect urban areas to public lands and form motorized recreation opportunities similar to the Paiute Trail in Utah (http://www.marysvale.org/paiute_trail/contents.html).
All routes currently in use should be identified in the analysis using the pictures included in the final decision.
Each road and trail should be inventoried and viewed on the ground to determine its recreational value and any significant problem areas that require mitigation measures. Each road and trail should be evaluated for its value as: a motorized loop or connected route; a source of dispersed campsite(s); exploration opportunities; destination such as an old mine and viewpoint or as access for all multiple use visitors. All routes currently in use should be identified in the analysis using the pictures included in the final decision. All existing roads and trails should be included on the inventory.
The BLM should address travel management on a landscape-level by evaluating the impacts of all trails in the planning area and tailoring its management prescriptions to account for and mitigate the landscape-wide impacts of trails and roads in conjunction with the objectives of the RMP.
Considerable trail and environmental mitigation work could be accomplished by programs similar to AmeriCorps and Job Corps if they were given that direction and organized to provide that assistance. Also motorized recreationists have a history of clearing trails. The agency's trail maintenance costs could be reduced if all trails were opened to motorized recreationists.
The lack of money to maintain OHV routes is being used as a reason to close OHV routes and at the same time Recreational Trails Program (RTP) and gas tax money paid by OHV recreationists is not being returned to OHV recreation. There is also unused motorized RTP money available each year. Additionally, the lack of money is used as a reason that new OHV routes cannot be constructed. The BLM and Forest Service must aggressively pursue and make use of all available forms of OHV trail funding including RTP, and a more equitable return of the gas tax paid by OHV recreationists.
The Government Accounting Office (GAO) has recently released a report with recommendations on long- and short-term improvements that could reduce maintenance backlog and enhance the sustainability of trails on the public lands (http://www.gao.gov/products/GAO-13-618).
The agency should use all trail maintenance and upgrading management techniques, such as, bridging, puncheon, realignment, drains, and dips to prevent closure or loss of motorized trail use. Trails should not be closed because of a problem with a bad section of trail. The solution is to fix the problem area or reroute the trail, not to close it. If funding or manpower is a problem, then other resources should be looked to including local volunteer groups, State or national OHV funding.

Trails should be cleared early in the year to insure maximum availability and reduction of diversion damage caused by routing around obstacles.
A standard and easy to read format should be used for travel plan maps. Travel plan maps and visitor use maps should be the same. All visitors need to clearly understand what areas, roads or trails are open for motorized travel and what areas, trails, or roads are closed to motorized travel. Confusing maps lead to misunderstandings by both non-motorized and motorized visitors.
There needs to be better coordination between adjoining land owners and BLM-managed lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.
The following route types should be included in the RMP analysis, maps, and documentation: Iditarod race trail; Iditarod National Historic Trail(s); Iron Dog Trail; secondary roads, winter trails, 17(b) easements; and R.S. 2477 rights-of-way. These are broad data sets that are fully or partially available and have legal or management implications to transportation. Inclusion of these route types on maps and in documentation, as appropriate, would greatly improve public understanding and the ability of land managers to anticipate the impacts of the transportation planning. The transportation section of this plan should seek to understand both the existing physical and legal network of transportation routes within, adjacent or leading to the planning area. Throughout the planning process, depictions, documentation, and discussion of the physical and legal land based transportation network should be improved upon as the various contributing parties, stakeholders, and public provide additional information.
All available mitigation measures must be adequately considered for those travel routes with environmental concerns. We strongly support mitigation before motorized closure and, in fairness to the public, encourage the agency to adopt this policy also.
The RMP must include a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss. It would be the responsibility of a cooperative group of public land management agencies to monitor the balance sheet and work towards no net loss/closure of motorized access and motorized recreation. Similar to other mitigation banks, motorized access and routes closed to motorized use would be replaced with equivalent routes on a one to one basis. Where equivalent routes cannot be found, then mitigation would be provided at 2 to 4 times the length of the closed route. Where equivalent access and/or areas cannot be found, then mitigation would be applied at 2 to 4 times the area closed depending on the quality of the closed route or area.
Site-specific monitoring of motorized versus non-motorized use must be provided for each route.
Sufficient background data must be collected to quantify the existing conditions in the resource area. If a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement as a result of the closure. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. In other words, the public needs to know how the decision made, the data on which it was based on including the source, and whether the data was adequate to substantiate the claimed environmental improvements.
An adequate site-specific analysis should include monitoring and quantification of existing motorized use versus non-motorized use, types of motorized use and visitors, and effects of motorized closures on the quality of the human environment. Examples and goals of site-specific analysis include: 1) single-track trails should be designated for motorcycle and mountain bike use; 2) 48" width routes areas should be designated for ATV use; 3) routes wider than 48" should be designated for UTV and 4x4 use; 4) open riding areas should be designated for trials bikes which have different riding area requirements than trail riding; and 5) motorized trail systems should be provided for all skill levels and types of popular motorized vehicles so that the needs of all motorized users are adequately addressed.

Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.
Non-motorized recreationists can use routes that are both open and closed to motorized recreationists including roads. The evaluation of opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can use an infinite amount of cross-country opportunity and motorized recreationists can not. A reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources.
The BLM should consider the ratio of motorized to non-motorized trails, and motorized to non-motorized visitors, in the planning area with a goal of providing a 1:1 balance of motorized to non-motorized trails. Additionally, the evaluation must adequately consider and address the fact that motorized access is limited as shown by the miles of roads versus the number of acres while the miles of non-motorized cross-country opportunity are infinite.
Routes constructed or maintained using motorized funds, including agency, gas tax and RTP, should not be converted to non-motorized routes.
The RMP analysis must take into account the percentage of lands within the planning area that are designated as wilderness or roadless areas. Multiple use lands should not be converted to de facto wilderness areas and managed solely for non-motorized recreation.
Surveys conducted by Citizens for Balanced Use in Bozeman, Montana show that motorized users travel on average 50 miles per day per visit to our public lands while non-motorized travel on average 2 miles per day per visit. Therefore, a quality experience for motorized recreationists requires about 25 times the amount of trail needed for non-motorized recreationists. The ratio of motorized versus non-motorized trails should be 50 miles per day of use versus 2 miles per day of use or 25:1.
Current management trends are creating more non-motorized acres and trails. The RMP preferred alternative should address this disparity and reverse the trend by managing all of the project area as motorized multiple use.
There is a built in bias in visitor use monitoring as all wilderness visitors must sign in, while there are few self reporting opportunities for multiple use visitors. Therefore, multiple use visitor use is under stated. The evaluation of a balance of opportunities between motorized and non-motorized should also include an accounting and comparison of facilities including trailhead facilities at wilderness areas versus trailhead facilities at OHV areas.
The RMP should disclose the added benefit to non-motorized recreation resulting from closure of roads by adding the miles of closed road to the miles of existing non-motorized trails.
To adequately evaluate and disclose motorized and non-motorized recreational resource and opportunity information, the following information must be used in the analysis: 1) miles and acres of non-motorized recreational opportunities available including all possible cross-country routes; 2) miles of roads and trails and number of acres to be closed to non-motorized recreationists; 3) miles of existing motorized roads and trails in the project area; 4) acres open to motorized recreationists under existing and proposed conditions; 5) percent of motorized and non-motorized recreational opportunities; and 6) miles of motorized trails and roads and acres closed to motorized recreationists under both existing and proposed conditions; and 7) cumulative miles and acres closed to motorized recreationists over the past 35 years in both the project area and region.
Millions of acres of public land in and near the planning area are designated national parks, monuments, wilderness and non-motorized areas where motorized access and recreation is not allowed or severely restricted. Therefore, the project area includes a significant number of non-motorized recreational opportunities that can be quantified in many ways. At the same time motorized access and recreation is limited to a relatively small corridor and network of roads and trails. The difference in visitor use between designated wilderness/non-motorized/exclusive-use lands and multiple use lands must be acknowledged and adequately addressed in the evaluation.
Hiking, horses, and mountain bikes should be treated as a form of transportation, just like motorized forms.
If there is a need for non-motorized trails, then the BLM should consider options that do not reduce the existing opportunity for motorized users.

Why must motorized recreationists always start with a proposal for radically less motorized access and recreational opportunities and then battle the process just to get a lot less than status quo every time? Why do non-motorized recreationists gain in every action and why do motorized recreationists lose in every action? It appears that cumulative effects on motorized recreationists are being ignored.
Non-motorized area boundaries should be aligned to not encroach on or eliminate motorized trails located near boundaries. Motorized trails should be provided to vista points outside of non-motorized areas so that motorized visitors can view those areas.
If impacts from cross-country motorized travel is significant enough to justify closures, then restrictions should also be applied to cross-country hiking and mountain climbing. Cross-country hiking and mountain climbing also create trails that provide visible evidence of human activity. Non-motorized trails and motorized trails are often equal in visual and resource impact.
The Forest Service looks out for the needs of non-motorized users by creating many miles of new non-motorized trails. We request the same cooperation between the BLM and a recreation group be extended to motorized recreationists. Trails should be designated for exclusive use by OHVs and that 100 miles of new motorized recreational opportunity be created as a demonstration of equal opportunity.
If light use of a trail is used as a criterion for closure of a motorized route, then non-motorized trails receiving light use should be converted to motorized to address the existing shortage of motorized use.
The prevailing trend of the past 35 years has been to convert large areas of federally managed lands from multiple use lands to wilderness/non-motorized/exclusive use lands which is direct contradiction to the number of visitors and their needs. The majority of visitors to the project area are associated with multiple use opportunities including motorized access and motorized recreation opportunities. Every reasonable multiple use acre must remain available for multiple uses in order to maintain a reasonable balance of opportunities. The greatest communal need for public lands is for multiple use which allows everybody to enjoy the resources and also promotes sharing and non-polarization of visitors.
The BLM has a responsibility as a public agency to provide adequate management for OHV recreation. This is something that the public wants and enjoys and the agencies must get off the fence and accept the responsibility to develop OHV recreational resources and manage public lands for OHV recreation.
National OHV criteria and standards are not entirely applicable to conditions in the project area. The analysis needs to allow for judgment on site-specific conditions so that the decision is a better match for local conditions and customs which center on motorized access and motorized recreation.
Some new trail construction may be needed to provide an adequate travel system. Therefore new trail construction must be included in the scope of the project.
Trail closures associated with other actions including timber sales, mining, and livestock grazing should be avoided. Corrective action should be taken where trail closures have resulted from these types of actions in the past. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems. Agencies are encouraged to re-establish and/or relocate all trails and roads disturbed by other actions.
Off-road use of ATVs should be minimized because it causes long-term damage to tundra vegetation. It takes decades for the tundra vegetation to recover from ATV damage.
The plan should provide for open OHV play areas and trials bikes in selected areas.
All of the motorized routes that are important to the public cannot be identified by clubs and individuals. Everyone that visits our public lands has a special road or trail that they like to visit. Getting everyone to participate and identify all of these routes is neither practical nor reasonable. Existing routes are there because they are important for access and recreational opportunities. Therefore, all existing routes without significant environmental impact should be considered as the preferred alternative.

Agencies are encouraged to seek outside review and input by OHV recreationists on all proposed management decisions affecting motorized recreation opportunities including closures.
The plan should acknowledge the existence of and include maps of access routes claimed by the State under R.S. 2477 and ensure that existing access routes are kept open for public use. The plan should include adequate research and coordination with the State to get their input on R.S. 2477 routes.
The State requests the BLM use the following language to describe R.S. 2477 routes identified by the State of Alaska. The limited definition helps to withstand minor policy changes, and the language has been thoroughly vetted by associated divisions and managers within the State: Under Revised Statute (R.S.) 2477, Congress granted a right-of-way for the construction of highways over unreserved public land. Under Alaska law, the grant could be accepted by either a positive act by the appropriate public authorities or by public use. "Highways" under State law include roads, trails, paths, and other common routes open to the public. Although R.S. 2477 was repealed in 1976, a savings clause preserved any existing R.S. 2477 right-of-way.
If the RMP considers seasonal closures the following should be considered: (1) provide the maximum amount of OHV recreational opportunity during the summer recreation season in order to disperse all forms of trail use and thus minimize impacts to trail users; (2) provide winter OHV recreation opportunities in areas that are not critical winter game range; (3) provide OHV recreation and access during hunting season by keeping major roads and OHV loops open while closing spur roads and trails necessary to provide reasonable protection of game populations and a reasonable hunting experience; and (4) provide OHV recreation opportunities during spring months in all areas where erosion and wildlife calving conditions reasonably allow.
ANILCA Section 1110(a) applies to the BLM-managed Iditarod National Historic Trail and the CAMA WSA. Section 1110(a) allows for snowmachines, motorboats, airplanes, and non-motorized surface transportation for traditional activities and travel to and from villages and homesites, subject to reasonable regulation. Implementing DOI regulations at 43 CFR 36.11 require a public hearing and rulemaking to implement closures, along with a finding that the use would be detrimental to the resource values of the area. To fully inform the public, the plan must reference these access provisions, including where they apply. In addition, should the plan propose restrictions or closures, they must be clearly described along with appropriate justification.
Section 811 of ANILCA provides for subsistence access on all federal public lands in Alaska, including access by OHVs where traditionally employed, subject to reasonable regulation... in addition to protecting subsistence resources, the RMP must also consider how the plan fulfills the ANILCA mandate to ensure reasonable access to subsistence resources.
The BLM has not promulgated implementing regulations for ANILCA Section 811; however, the BLM Director's Protest Resolution Report for the Delta River Special Recreation Management Area Plan stated "BLM will continue to strive to be consistent with other federal land management agencies in this regard." The U.S. Fish and Wildlife Service and National Park Service Section 811 implementing regulations are at 50 CFR 36.12 and 36 CFR 13.460 respectively. Pursuant to both sets of regulations, subsistence access closures or restrictions (including such actions as size and weight limitations and off-trail limitations) may only be implemented when certain criteria have been met and notice and hearing requirements have been followed. While ANILCA Section 810 requires agencies to evaluate the impacts of proposed actions on subsistence resources and uses, including access, NPS and USFWS regulations established a separate and distinct process for implementing access restrictions. Similar to the BLM, the Forest Service also does not have ANILCA Section 811 regulations. To resolve the inconsistency between the national 2005 Travel Management Rule and ANILCA, the Forest Service, in consultation with the State, developed regional policy guidance, which is consistent with the intent of ANILCA and other DOI agency ANILCA implementing regulations. To ensure the consistent implementation of ANILCA throughout Alaska, the BLM must develop similar regional guidance.
Closed unless posted open road signs is impractical, confusing to the public, and should not be used. Trail signage could be used to identify the difficulty of a particular route similar to ski runs so recreationists are made aware of the skill levels required and so that a wide variety of routes for all skill levels can be enjoyed.
Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail.

<p>The evaluation needs to distinguish the difference in trail requirements and impacts between ATVs and motorcycles. single-track motorcycle trails require less maintenance for erosion and use. Single-track trails that are not appropriate for ATV use should be kept open for motorcycle use. Trails designated for motorized single-track use without physical features to prevent ATV use should include adequate signing and barriers to inform ATV enthusiasts and prevent inadvertent use. Single-track challenge trails are needed for expert riders and trials type motorcycles.</p>
<p>The Central Yukon area is a popular area for motorcycle single-track trail riding and there are many enthusiasts in the area. There are no significant motorized single-track trails in the area. Motorized single-track trails are a uniquely different resource and experience compared to ATV trails and must be recognized as such. This is an issue that should be addressed.</p>
<p>Motorcycle trail riders were the original motorized trail users and have a long history of trail maintenance and trail etiquette. The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. Therefore, it is a reasonable alternative to designate all single-track trails on multiple use lands open to motorcycle use.</p>
<p>The agency should commit the resources and has an obligation to evaluate the needs of OHV recreationists at a least the same level of detail as key wildlife and natural resource areas. site-specific analysis includes adequate identification and inventory of all existing motorized routes and adequate evaluation of the public's need for those routes.</p>
<p>Ruts caused by ATVs in corners are often due to the solid drive axles which do not allow the wheels to turn at different speeds. These ruts could be significantly reduced by encouraging all manufacturers to develop machines with differential axles that allow the outside and inside tires to turn at different speeds.</p>
<p>State-selected lands should be managed consistent with DNR policies as outlined in the Fact Sheet titled Generally Allowed Uses on State Land.</p>
<p>An authorization may be required from the ADFG's Division of Habitat for any motorized travel in fish bearing streams or work below ordinary high water.</p>
<p>The integrity of the "loop" trail systems should be maintained. Loop systems minimize the number of on-trail encounters and offer trail users a more desirable recreational experience. Spurs are useful for exploration and reaching destinations.</p>
<p>Agencies are encouraged to allow use of specific roads for OHVs that are not licensed for the street use in order to develop a network of roads that tie OHV trails together.</p>
<p>There is a need for youth loops and a variety of motorized trails for various skill levels. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. This important need should be adequately addressed in the preferred alternative.</p>
<p>A new standard for motorized recreational trails could be developed that would be more beneficial for the environment and motorized recreationists. The new standard for motorized recreational trails would not necessarily follow the shortest distance between two points and would include many curves to keep the speed down and increase the fun factor. Advantages of this approach include: routes could easily be moved to avoid cultural resources and sensitive environmental areas; routes are less visible on the ground and from the air; aesthetically pleasing; lower speeds and greater safety; easily incorporates dips and swales for diversion of water from the route (environmental protection) and greater enjoyment by motorized recreationists.</p>
<p>We are working hard to convince OHV recreationists to "tread lightly". We have been informed that trails were closed because they "saw very little motorized use" as part of the BLM Sleeping Giant Travel Plan. These actions would suggest that we should "power on" so that our tracks and usage are obvious. We think that it sets a bad precedent to close a route because it appears to see little use. It is not fair that motorized recreationists practice "tread lightly" principles and are then penalized for following that practice.</p>

<p>Because of the excessive closures proposed by travel management planning, motorized recreationists are forced into a confrontational position with the agency in order preserve any sort of reasonable solution. This is not our choice and we are disadvantaged by being placed in this position. We would in collaboration with the agency, but once again the travel planning process is being approached as a “closure” process. We are concerned that this is a conscious strategy to put motorized recreationists, who are largely unorganized, at a disadvantage. We ask that this concern be adequately addressed and that significant changes be made to the procedures in order to eliminate this disadvantage.</p>
<p>Many multiple use and motorized recreationists have expressed a concern about the general lack of trust in the travel management process. They feel that travel management decisions are predetermined, that it is pointless to participate in the process, and that travel management is not intended to meet their needs.</p>
<p>The BLM National Management Strategy for Motorized Off-Highway Vehicle Use, was presented to OHV recreationists as a “route designation” process that would designate motorized routes for the appropriate type of motorized use (motorcycle, ATV, UTV, 4x4, etc.). It was accepted by motorized recreationists on that basis. The rule specifically allows new motorized routes. The rule did not authorize or direct a massive motorized closure process. However, in actual implementation, the travel management rule is being used as a massive motorized closure tool contrary to the wording of the rule and the presentation of the rule to the public during the rule making process. Implementation of the rule has included very few new routes. Proper implementation of the travel management rule is a significant issue. We request that this evaluation carefully consider the intent of the National Management Strategy for Motorized Off-Highway Vehicle Use and use it to designate existing motorized routes and create new motorized routes.</p>
<p>The purpose and need for this project must follow through on the National Management Strategy for Motorized Off-Highway Vehicle Use Final OHV Rule as a route designation process as it was presented to motorized recreationists during the rule making.</p>
<p>Routes should not be closed due to user conflicts. If closure is considered, it is inappropriate that conflicts always be resolved by closure to motorized users. Closure to hikers or stock users is an equally effective resolution.</p>
<p>A reasonable alternative to address user conflict is sharing by all users. This could be accomplished by designating alternating weeks for motorized and non-motorized use or to share areas with non-motorized use allowed one year and then motorized use in the following year. The schedule can be communicated to the public by signs at each end of the trail segments, newspaper articles, and through local user groups. This alternative eliminates any reasonable concern about conflict of users.</p>
<p>Executive Orders 11644 and 11989 allow agencies to “minimize conflicts among the various uses”. The Executive Orders did not state “minimize conflict with other users”. However, the implementation of Executive Orders 11644 and 11989 has been largely based on the incorrect interpretation to “minimize conflict with other users”. The bottom line is that “use” conflict is rather different from “user” conflict. There are certainly “uses” that are incompatible from an objective standpoint. For example, a ski run and a mine cannot operate in the same place at the same time... it is physically impossible and therefore a clear “use conflict.” However, in the case of a mine located next to a ski hill, both can operate without a use conflict.</p>
<p>Flexible management is needed to ensure that OHV use does not irreparably damage Alaska’s changing landscapes. Education and monitoring is needed as well as clear trail designation and identification to ensure that unchecked trail widening and expansion does not continue within the planning area.</p>
<p>Recreational OHV use has had major impacts on the planning area. The scarring damage on vegetation and sensitive tundra needs to end and strong preventative measures and enforcement need to be put in place.</p>
<p>There is ample access for OHV uses in the planning area. Ongoing management for these areas needs to be improved to prevent the continued abuse of OHV users and maintain a high quality environment for future users. Furthermore, changes resulting in increased ORV uses in the planning area, especially in the Dalton Highway sub-unit could have major cumulative impacts to adjacent public lands including major change in access and uses within extensive areas of national wildlife refuges and national preserves.</p>

In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trails, the creation of illegal trails would be greatly diminished. The catch-22 of the closure trend is that in the end it feeds the illegal activity. It would be a more advantageous and equitable situation to proactively manage motorized recreation.
The use of “unauthorized trails or roads or user-created routes” is not an appropriate term as many of these routes were created during periods going back to the 1800s when lands were managed without designated routes, cross-country travel was allowed, and access and use was encouraged. Many of these routes have been used for decades and are “historic routes”. The use of “unauthorized trails or roads or user-created routes” is an inaccurate representation of the management conditions and uses allowed in the past. This term should not be used. Nor should these trails be closed just because they are not on the current inventory. A reasonable travel management alternative would use area closure to prevent the creation of unwanted trails by visitors and, at the same time, allow the public to use all of the existing motorized routes.
Managing Degraded Off-Highway Vehicle Trails in Wet, Unstable and Sensitive Environments (USDA Forest Service Kevin G. Meyer) prescribes many ways to deal with and prevent trail degradation including: location documentation, condition assessment, improvement prescriptions, implementation and maintenance and monitoring.
The BLM should consider if seasonal restrictions are needed to protect wet or seasonally wet areas and alpine areas. The current weight limit of less than 1,500 pounds may not be sufficient to protect these areas.
Agencies are encouraged to keep trails in proposed nonmotorized/wilderness/roadless areas open. Motorized-use on trails in these areas does not detract from the wild characteristics.
The lack of a comprehensive trail inventory on BLM-managed lands could result in unforeseen impacts from decisions to protect wilderness characteristics.
Winter ATV riding has become very popular and winter ATV areas should be considered.
The RMP should describe the current status of R.S. 2477 trails in the planning area, specifically the trail that was used for the Nome Serum Run that is part of the Manley mail trail between Tofty and Tanana. The R.S. 2477 trail (closer to Tofty on the eastern side) is experiencing increased four wheeler and hunter traffic. Users are going further and further afield which is starting to degrade the trail. The BLM could consider closing that trail in the summertime to vehicular use.
The BLM should clarify the relationship of easements to trails and allotments. Specifically, the area between Nulato to Last Chance to the (Piko?) overland trail was identified as needing clarification of where easements are located on the trail system.
Land Use on BLM-managed land needs to be compatible with neighboring uses; especially the adjacent federal conservation units of parks and refuges and areas of traditional land use by Alaska Natives. There could be cumulative impacts to the broader ecosystem of which the BLM-managed lands are a part. Some of the land near Lake Minchumina is Mental Health Trust Lands and the RMP should evaluate its relationship to these areas.
I would like to see the off-road vehicle corridor maintained (no vehicle use along the Dalton Corridor - off the highway). This should include snowmachines and airboats.

A.23. Vegetation

If activities under the RMP may impact native or rare plants, the Draft RMP/EIS should include general locations of rare plants and how these sites will be managed to minimize impacts on the plants.
The BLM should consider if climate change will jeopardize certain plant communities, such as those occurring on sky islands. If so, these areas may need protection from other stressors to avoid synergistic effects.

The Draft RMP/EIS should discuss the extent of vegetation removal, whether the removal would occur on steep slopes, in or near riparian areas, and where soil damage was particularly severe due to previous activities.

Vegetative habitats around Lake Minchumina are very diverse, providing a diversity of resources within close proximity to the community.

A.24. Visual Resources

Trails should be considered part of the natural landscape when considering visual resource management. Also the visual appearance of both motorized and non-motorized trails is equal in most cases and should be recognized as such.

Visual Resource Management Class I is the appropriate for Wild and Scenic Rivers and all corridors should be managed as VRM class I.

When determining the visual resource management class for remote areas, the BLM must work closely with local communities to maintain objectives for subsistence resource protection and potential special designations.

A.25. Water and Wetlands

The EIS should include a description of waters of the U.S., the general condition of these waters, and if specific proposals for the fill of these waters are anticipated, a draft 404(b)(1) evaluation. The analysis should be used to identify the least environmentally damaging practicable alternative, if applicable.

The BLM should continue (or resume if it has been suspended) on-site water level and inflow monitoring and analyze data to look for patterns that may suggest alteration in hydrologic regimes. Management implications of these landscape-level changes should be considered in the BLM management plan, particularly in the commitment of water resources and the short and long term health of aquatic systems.

Transportation of equipment to and from resource exploration and development sites should be routed in uplands to the maximum extent practicable to avoid crossing waterbodies and/or require winter transport, particularly when crossing fish-bearing waterbodies. Stream substrate of crossing locations should be composed predominately of cobble.

Identify the baseline data that needs to be collected to ensure the region's waters are not being impacted by human activities allowed under the RMP. Inform the public of existing baseline data exist as well as plans for data collection.

If anticipated projects under the RMP/Draft EIS would involve discharge of dredged or fill material into waters of the U.S., the RMP/Draft EIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated, including the elements:

- Acreage and habitat type of waters of the U.S. that would be created or restored.
- Water sources to maintain the mitigation area.
- Revegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for planting.
- Maintenance and monitoring plans, including performance standards to determine mitigation success.
- Size and location of mitigation zones.
- Parties that would be ultimately responsible for the plan's success.
- Contingency plans that would be enacted if the original plan fails.

The BLM should inventory all streams and rivers used as drinking water sources and manage them for drinking water quality.

The RMP/Draft EIS should include information explaining why specific activities would be located in floodplains, what alternatives were considered, and the steps to be taken to minimize impacts to floodplains. Unimpaired flood flows should be preserved and flood-related damage to downstream resources should be prevented.
Maintain in-stream flows to support healthy riparian and aquatic habitats.
Identify point and non-point source pollution sites along the river and prioritize these locations for clean-up and remediation.
What percentage of waterbodies within the Central Yukon RMP are currently or have been on Alaska Department of Environmental Conservation's Impaired Waterbody list?
Activities related to locatable mineral and leasing activities need to be considered as they may create issues related to stream management, stream fragmentation and non-point pollution.
The BLM needs to publicly share the data and findings from monitoring programs initiated in 1986 (after the Central Yukon ROD was implemented) and analyze their effectiveness in maintaining environmental quality goals to make informed decisions about future planning in the area.
The RMP should consider whether water table and permafrost monitoring should be conducted.
How will the BLM control non-point source water pollution related to development activities, including surface-disturbing activities?
The State Departments of Fish and Game and Natural Resources should both be consulted regarding management of all waterbodies within the planning area for issues related to State authorities, including anadromous stream crossings, diversions, public use, placer mining, and dam construction.
The BLM's NEPA analysis should include a full analysis of the agencies trust obligation as directed by ANILCA to file instream flow applications and/or apply federally reserved water rights in order to protect Native Alaskan village community's subsistence uses.
Turbidity commonly exceeds the State standard during periods of high flow and as a result of water control issues during active mining operations.
The State of Alaska's authority over most discharges to state waters, as well as impacts and proposed mitigation associated with anticipated discharges, should be discussed in the EIS.
The BLM must evaluate the potential impacts of mining and exploration activities on water quality. The BLM must ensure that water quality is not degraded by mining operations on public lands.
The RMP/Draft EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters.
The USFWS stresses the importance of maintaining water quality and quantity in areas of known anadromous fish spawning grounds that are critical for providing subsistence resources for villages within and adjacent to the planning area, and near the Refuges. These rivers include, but are not limited to: the Gisasa River, Kateel River, Dakli Creek, Wheeler Creek, Sulukna River, Titna River, Telsitna River, the upper Chandalar River, West Fork, Dall River, Sethkokna River, Middle Fork Koyukuk River, Jim River/Prospect Creek/South Fork Koyukuk River, Kanuti River, Fish and Bonanza Creeks, Kanuti Kilolitna River and the Tagagawik River (See Appendix A for Justifications). The USFWS recommends maintaining the existing withdrawals for mineral leasing and include the entirety of these rivers and creeks in the current withdrawal designations. In addition, USFWS recommends collecting baseline water quantity and quality data for support of state instream flow reservation applications and other regulatory purposes.
The USFWS stresses the importance of upholding their purpose as Refuges to maintain water quality and quantity and highlights concern for any activities or actions that occur on BLM-managed lands adjacent to refuges that may compromise the ability of the USFWS to meet their mandates.

The RMP/Draft EIS evaluation should determine how the anti-degradation provisions would be met.
Maintain water quality that satisfies State standards and provides for stable and productive riparian and aquatic ecosystems.
The BLM should report those waterbodies potentially affected by the RMP that are listed on the State of Alaska's most current EPA-approved 303(d) lists. The RMP/Draft EIS document should describe existing restoration and enhancement efforts for those waters, how the RMP will coordinate with ongoing protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters.
Maintain natural timing and variability of the water table elevation in meadows and wetlands.
The BLM should work with the Yukon River Inter-tribal Working Group to support the implementation of their approved management plan and to gain an understanding of this management strategy.
The lack of access to fresh water is increasing becoming an issue of environmental concern throughout the world. Forty percent of the nations' fresh water resource, as opposed to clean water within the meaning of the Clean Water Act, is in Alaska.
The BLM should address concerns raised about how current and planned mining operations can meet State and federal water quality standards and evaluate the impacts to fish and wildlife from nearby water resources. The Central Yukon RMP should assess how the management of mining activities meets State and federal water quality standards and review pertinent and applicable data sets for before making conclusions.
The RMP should clarify concerns regarding jurisdiction between the BLM and the State of Alaska in determining navigable waterways and access to water. The plan should discuss whether or not there are provisions under ANILCA that authorize the federal government to pursue in-stream flows on behalf of tribal governments.
Maintaining free access to water was an issue important to one commenter who expressed concern that water belongs to Alaskans and that the federal government should not be in control of rights to water or be allowed to lease water rights.
The BLM should manage riparian vegetation to ensure diversity and productivity of native plant communities. Objectives should be to: provide woody debris of natural aquatic and riparian ecosystems; provide adequate summer and winter thermal regulation; achieve surface erosion, bank erosion, and channel migration characteristic of those under which the communities developed.
If the BLM proposes to remove the withdrawals from lands currently closed to mineral entry and location in the Central Yukon RMP, then add "How will the BLM address the requirements of the Executive Orders E.O. 11988 Floodplains Management in the planning process? - given the following: "(2) If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains. If the head of the agency finds that the only practicable alternative consistent with the law and with the policy set forth in this Order requires siting in a floodplain, the agency shall, prior to taking action, (i) design or modify its action in order to minimize potential harm to or within the floodplain, consistent with regulations issued in accord with Section 2(d) of this Order, and (ii) prepare and circulate a notice containing an explanation of why the action is proposed to be located in the floodplain."
The RMP/Draft EIS should describe all waters of the U.S. that could be affected by the RMP/Draft EIS alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters.
Projects affecting waters of the U.S. would need to comply with Clean Water Act Section 404 requirements. Section 404 regulates the discharge of dredged or fill material into waters of the U.S., including wetlands and other special aquatic sites. The U.S. Army Corps of Engineers issues Section 404 permits using EPA guidelines.

If the BLM proposes removing the withdrawals from lands currently closed to mineral entry and location in the Central Yukon RMP, how will the BLM address the requirements of the Executive Order (E.O.) 11990 Protection of Wetlands in the planning process? - given the following?" "...to avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or Indirect support of new construction in wetlands wherever there is a practicable alternative, it is hereby ordered as follows: "Section 2. (a) ...each agency, to the extent permitted by law, shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds (1) that there is no practicable alternative to such construction, and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use." "Sec. 5. In carrying out the activities described in Section I of this Order, each agency shall consider factors relevant to a proposal's effect on the survival and quality of the wetlands. Among these factors are: (b) maintenance of natural systems, including conservation and long term productivity of existing flora and fauna, species and habitat diversity and stability, hydrologic utility, fish, wildlife, timber, and food and fiber resources; and (c) other uses of wetlands in the public interest, including recreational, scientific, and cultural uses.

Monitor and evaluate impacts to riparian zones (vegetation, moose habitat, boreal migratory bird nesting habitats) prior to potential mining and evaluate direct and cumulative impacts.

Protect wetland, riparian, and aquatic resources and function from the adverse effects of proposed mining, pipeline development and operation, roads, and other human activities. Promote resilience of wetland communities.

A.26. Wildlife

The RMP should include efforts to conserve caribou habitat such as: prohibiting industrial activities in the core seasonal habitats, avoiding disturbance to caribou as they engage in their annual seasonal movement, and avoiding range fragmentation.

Climate change could alter the distribution or quality of caribou habitat.

The RMP should include an analysis of habitat connectivity, identification of potential wildlife corridors, and management alternatives for protecting and/or restoring important corridors.

The RMP should describe how the BLM will maintain landscape connectivity in terms of fish and wildlife corridors given the proposed Roads to Resources State of Alaska program that would require egress through BLM-managed lands.

Wildlife habitat management in the planning area must be consistent with U.S. Department of the Interior guidance, adjacent federal land agencies policies and purposes, Alaska Department of Fish and Game objectives, and the Federal Subsistence Board requirements and mandates.

In order to enhance/maintain wildlife and habitat goals both on BLM-managed and adjacent lands, efforts must be coordinated.

The BLM should collaborate with other agencies to obtain current data regarding crucial wildlife habitat and corridors, connect Conservation Units, ensure that administrative designations enable corridors to function as designed, monitor the effectiveness of identified wildlife corridors, and implement adaptive ecosystem management strategies.

There is no authorization or mandate from Congress for [wildlife corridor] designation and use of public land.

The Central Yukon Field Office should utilize the policy brief entitled "Designating Wildlife Corridors on the Public Lands: Protection through BLM's Land Use Planning Process" along with scientific data available through the Crucial Habitat Assessment Tools or other reputable sources, to develop alternatives for wildlife corridor protection in the RMP and adopt a strategy for managing habitat connectivity.

Protections should be considered in the Central Yukon and Utility Corridor RMP for caribou migration routes, caribou calving grounds and moose wintering habitat. Including the Western Arctic, Central Arctic, Teshekpuk, Porcupine, Hodzana Hills, Ray Mountain, Nelchina, and Galena Mountain caribou herds.

The RMP/Draft EIS should describe the current quality and potential capacity of habitat, its use by fish and wildlife on and near the planning area, and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation. If fish and wildlife, aquatic, and terrestrial habitats will be significantly impacted because of activities under the proposed RMP, then the RMP /Draft EIS should include mitigation measures to minimize the impacts.

Dietrich River Valley, Snowden Mountain, Nugget Creek Hill, and Poss Mountain should be considered for critical habitat designation and commercial hunting permits issued for Dall sheep in these areas should be eliminated.

At this time the Service cannot determine if any actions related to this plan have the potential to adversely impact listed species. The Service recommends that when the proposed actions of this plan are developed that the BLM then contact Endangered Species Branch, Fairbanks Fish and Wildlife Field Office, to determine if consultation under the ESA is necessary.
The BLM should exhibit a more balanced consideration of recreation versus fish and wildlife populations in the decision making. Fishing and hunting closures would be more effective in maximizing fish and game populations than placing restrictions on motorized recreationists.
The RMP/Draft EIS should discuss the effects of habitat fragmentation and the creation of edge effects, including mitigation measures.
Use the term "general hunting" in lieu of the term "sport hunting" in the RMP for consistency with terms used in the State hunting regulations.
Commenters expressed concern about the use of domestic sheep, goats, and camelids throughout the planning area and in particular along the Dalton Highway corridor, especially those lands within and adjacent to Dall sheep habitat. Dall sheep in Alaska have not been exposed to most livestock diseases, and therefore, have native immune systems with extremely low resistance to these diseases. Domestic sheep, goats and camelids are recognized as being at high risk for carrying disease organisms. As such, the acceptable level of disease risk for Dall sheep should be set at a low threshold. The RMP should consider restrictions on the use of goats and related species in or near Dall Sheep habitat.
The BLM must work with local communities to gain more information about wildlife populations and habitat, riparian areas, wetlands, and trails within the watershed.
The BLM needs to develop a cohesive monitoring system for the region. The BLM should be forthcoming about monitoring success and evaluation of the planning area for wildlife life habitat and management goals.
A commenter provided a traditional knowledge map regarding moose hunting grounds on the Venetie Block.
<p>Commenters provided anecdotes about wildlife populations in the project area:</p> <ul style="list-style-type: none"> • "We used to have moose in the streets [of Bettles/Evansville]. They [moose] used to get on the road. You couldn't get past them. The moose got used to cars and pistols and just defy you if you want to get back. We had some guys from Fort Wainwright and took 17 moose up the Wild River during one spring subsistence hunt and we haven't seen them since. Of course that's where I used to go. I haven't been back to the Wild River in a while, but I don't think the moose are up there. Moose don't just migrate. They don't move unless they get pushed. There's moose on the Henshaw Creek, but that's a long ride on a boat." • A commenter who worked for the State of Alaska in 1974 flew over the area behind Lake Clark and Grand Mountain frequently. There was a caribou herd in the summertime and about 50 years ago they used to come down a canyon by Rampart north and south. • We don't get many caribou around Nulato. It's been a long time, 21 years. There is the Western Arctic Herd and there is also this little herd up there called the [Ray] Mountain Herd.
The RMP/EIS should determine the proper level of guide and air transporter activity on BLM-managed lands in the planning area, whether these activities should be coordinated between involved agencies, and whether there should be a public use step down plan for certain areas.
Moose continue to be a subsistence resource in the Tozitna drainage, perhaps due to the remoteness of the area and the current harvest restrictions.
In Galena, big game guides use the BLM-managed lands more than others.
There is inadequate documentation or reasoning to justify closing the wildlife corridor to motorized use.
Noise from air boats may scare wildlife away from river.
The BLM should not reference "population levels" in any of its issues, criteria, or goals/objectives for the RMP because they are outside the RMP's scope. Except for some migratory species, population goals and objectives are the responsibility of the State. The RMP should accurately describe the BLM's land management role in habitat management, and ADFG's authority as the manager of fish and wildlife.
Given that predator control is allowed on BLM-managed lands and may affect adjoining federal lands and resources, the BLM should consider analyzing these impacts as directed by the National Environmental Policy Act (NEPA).
Any restriction on a particular resource use to protect habitat should require rigorous data to support the decision, including consultation with the appropriate State manager and area residents. Analysis of the decision should consider the extent, level of intensity, frequency of the particular activity, and the impact of the specific disturbance at the population scale of the resource.
Any specific action or restriction beyond what can be regulated under the statutory authority of the State should be considered on a case-by-case basis.

Road density criteria must be used with reasonable judgment and consider the mitigating effects that an adjacent block of roadless area has on a roaded area that exceeds the desired road density. Oftentimes these areas that exceed the ideal density are very valuable multiple use motorized areas and border on large roadless areas that provide more than adequate wildlife security thereby effectively mitigating the impacts associated with the roaded area.
Local communities rely on seasonal caribou migration to provide for family and community members. A road could impact subsistence use because it has the potential to alter the caribou's migration, and that impact could be worse if the road is heavily trafficked. If a road were to change caribou migration patterns and in turn force people to travel farther from the village, many people would not be able to participate in an activity that defines who they are. This jeopardizes the very culture of the local community.
The BLM is encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented.
Road density evaluations must also consider the viable alternative of closing a reasonable number of routes during hunting season and other critical seasons [for wildlife] and then opening them during the summer recreation season. This strategy would effectively address road density criteria without nearly as many motorized closures as proposed.
Wildlife mortality from OHV activity should be considered minor and should not be used as a reason to close roads and trails to OHV visitors.
The BLM is encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.
How will the effects of disturbance on BLM sensitive species like nesting golden eagles, or other sensitive species, resulting from land uses be minimized and the residual effects mitigated?
The BLM is encouraged to inventory and provide a list of song birds in the boreal forest, including birds that may be facing population declines.
The ADFG no longer maintains a "Species of Special Concern" list and the BLM should remove references to such a list from the documents.
The BLM should recognize existing State of Alaska authorities relative to fish and wildlife management.
Alaska resident hunters may subsistence hunt under state hunting regulations as well as under specific federal regulations. Subsistence hunting encompasses more than hunting under the federal subsistence hunting regulations.
Subsistence resources in the Ray Mountains are stretched pretty thin. It is the inaccessibility of the populations that is saving them. Even nonconsumptive users, especially if easy access is available, could affect the caribou. The caribou may totally leave their historically used areas.
The RMP /Draft EIS should discuss how vegetation removal would support retention of vegetation structures that are important for wildlife migration, recruitment and dispersal, rearing and feeding.
The BLM should prioritize the long term health and maintenance of the WACH and the habitats upon which it depends within the planning area to ensure the health of the herd and subsistence opportunities for the communities of northwestern Alaska.
A comprehensive understanding of the cumulative impacts of fire, climate change, landcover and habitat on caribou are needed. Such an analysis needs to be based on the best available quantitative data, and should attempt to identify critical thresholds for habitat and caribou populations.
Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, and corresponding dearth of motorized vehicles, and absence of development activities ensure clean air and water. Additionally, the lack of disturbance provides for productive wildlife habitat and riparian areas, which support both wildlife habitat and human uses of water.
The BLM should consider evaluating and maintaining existing withdrawals in areas where conservation linkages between federal estates have been identified in the Central Yukon RMP planning process for continued protection of watersheds and habitat connectivity among lands adjacent to and upstream from other federal conservation units.
Lake Minchumina provides important habitat for migratory birds, including waterfowl and raptors. The lake and surrounding flats provide resting habitat for common loons in the fall.

A.27. Other Comments

This section includes vague comments or questions, non-substantive comments, out-of-scope comments, and general motherhood statements.

The Yukon River is the fourth largest watershed in North America, and is of astounding local, national and international significance. It serves as a transportation corridor and drinking water source for residents. The river provides essential habitat for salmon and resident fish as well as many wildlife species.
Why are the BLM and Forest Service trying to eliminate all meaningful motorized access and OHV recreation?
The federal government does not have control over fish, game, and wildlife resources in Alaska.
The BLM is also initiating the Bering Sea Western Interior Plan at this time.
The BLM is required by law to manage for multiple uses.
Clarification is required regarding the quantity of conservation system units managed by the BLM. Remaining federal lands that are not designated CSUs are governed by the Federal Land Policy and Management Act (FLPMA) for multiple use.
The BLM could notify the tribal village and Regional Corporations for contracting opportunities through the BLM.
The BLM should bolster its legal staff by retaining private law firms to defend their multiple use land management decisions.
The BLM should describe the exploration studies that it conducts.
The fish wheels on the river are not shared, those all belong to individuals.
The BLM should describe its relationship with the Forest Service.
Galena Mountain caribou are not being managed as a subsistence resource.
Reduce the need for gravel through better-designed State roads
Describe the relationship between the resource management plan and House Bill 77, if any.
Statistics summarizing acres of multiple use and restricted use on Department of Interior lands are not readily available to the public; however, a significant portion of these lands have limited motorized access and limited motorized recreational opportunities. The Department should adequately disclose these land use statistics to the public as quickly as possible.
Hughes sits in the middle of a township that is all owned by the corporation. Hughes is surrounded by BLM-managed land about six miles away.
The Koyukuk area did not experience many insects during the summer of 2013. During 2014, the area did not experience gnats.
Access to Native Corporation land is different than access to federal land.
The BLM does not have a title to Tanana land.
All the Tozitna land allowed to be selected were selected.
At one point, all the lands must have been BLM-managed lands before they were selected.
The BLM website has links to maps showing allotment owners.
State Mental Health Trust is the primary landowner in Lake Minchumina.
What is the extent of State land selections?
Is it possible to trade a native allotment with the BLM? Issue dismissed because of the peculiarities of the Native Allotment Act and the Native Veterans Allotment Act.
Clarification is required regarding recognized and protected valid existing rights.
Alaska contains some of the last truly wild places on the planet. Please limit development on these lands and leave them in a pristine condition.
Alaskans should experience Spooky Valley.
It seems that most often, business comes first. When it is at the expense of the health of the environment, then it really doesn't make sense. This is "our" environment, it is what sustains us. Without a healthy environment, there is no chance for a healthy populace. It doesn't matter how wealthy you are, if the air is so tainted with toxins, human life cannot continue. Without a nutrient rich soil, we can't grow nutritious food, therefore we won't have the ability to sustain life. So often, messes are left behind from mining or other activities and no one will take the responsibility to clean up afterwards.
Subsistence is practiced in Wiseman.
Subsistence rights are identified under the State Constitution.
The BLM does not have authority to allow individuals to claim trapping areas.
Commenters at Tanana, Venetie, and Anaktuvuk Pass noted that the lands under BLM management belong to the Native people. Other claims to these lands are invalid as it is the first peoples who have a valid and existing right that is not being recognized. The federal government has not fulfilled its trust responsibly to the Native people who own these lands and therefore the current process and plan is invalid.
The federal government holds too much land in Alaska. Some should be transferred to the tribes and State.
The BLM does not understand life in the bush and thus is not prepared to plan for this area.

The RMP needs to be science based and use landscape planning techniques. The RMP should limit development and emphasize environmental protection.
Travel management is a closure and restriction process.

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