

The Bay Resource Management Plan Scoping Report

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I. Introduction

A. Overview, Purpose, and Need for the Bay RMP

The Anchorage Field Office of the Bureau of Land Management (BLM) is preparing the Bay Resource Management Plan and Environmental Impact Statement to provide a comprehensive framework for managing and allocating uses of the public lands and resources within the Bristol Bay and Goodnews Bay areas of southwest Alaska. Currently, the Southwest Management Framework Plan (MFP), completed in 1981, guides the use of the portion of these lands that lies within the Goodnews Block. This MFP is now out of date. A new Resource Management Plan (RMP) is necessary to comply with the Federal Land Policy and Management Act and 43 CFR 1600 to address lands within the Bay planning area not previously covered by a plan, to implement new programs and regulations, and to address any new issues that have evolved since the MFP was approved. The Bay RMP will address resource management issues for which new standards exist, and will provide direction for site-specific activity planning and implementation of specific tasks that may occur in the future.

Of the seven planning blocks of BLM land that were identified in the 1981 Southwest MFP, only the Goodnews Block will be covered in the current Bay planning area. Once approved, the Bay RMP will supersede that portion of the existing MFP that addresses the Goodnews Block. An overview of the Goodnews Block section of the Southwest MFP is available upon request by contacting Patricia McClenahan, Bay RMP Team Lead, using the contact information on page 30.

The Federal Land Policy and Management Act of 1976 (FLPMA), as amended, provides the authority for the BLM to conduct land use planning on public lands. In particular, Section 202 (a) requires the Secretary of the Interior, with public involvement, to develop, maintain, and, when appropriate, revise land use plans that provide for the use of the public lands by tracts or areas. Implementing regulations are contained in the Code of Federal Regulations at 43 CFR 1600. BLM Manual 1601 Land Use Planning and the BLM Land Use Planning Handbook (H-1601-1) provide procedures and guidance for the planning process.

B. Description of the Planning Area

The Bay planning area consists of a broad, level upland tundra-covered river basin at the head of Bristol Bay, and a smaller area to the west drained by the Goodnews River that comprises Goodnews Bay (see Figure 1 on page 4 for a map of the planning area). The major rivers draining the Bristol Bay basin are the Naknek, Kvichak-Alagnak, Nushagak, and Togiak rivers. The Goodnews drainage dominates the Goodnews Bay portion of the planning area. Mixed spruce and deciduous forests can be found northward toward the interior and westward in the planning area, particularly along rivers. Some BLM lands in the Bristol Bay basin are partially forested.

The rivers of Bristol Bay support world-class anadromous fisheries that provide subsistence as well as commercial and sport opportunities. The fishing industry is the top industry in the region, but it is cyclic in nature. Two major caribou herds, the Mulchatna herd and the Northern Alaska Peninsula herd, utilize range in the area. Some of the largest brown bears in North America reside in the planning area, as do a wide variety of other sport and subsistence animal and plant species.

According to Census 2000, 7,827 people reside in the Bay planning area. Residents are spread across four political subdivisions: the Bethel and Dillingham census areas, and the Bristol Bay and Lake and Peninsula boroughs. Additionally, portions of three Regional ANCSA corporations are within the planning area: Calista, Incorporated Ltd., Bristol Bay Native Corporation, and Cook Inlet Region, Incorporated. Residents live in one of the most traditional subsistence regions in Alaska. Natural gas, coal, and coal bed methane may be present in the region and there may be potential for developing these resources for use by the residents; however, there is little or no developed local energy at present. A few families have windmills, but most energy is derived from diesel that is barged to the region. Transportation is predominantly by air or water. The planning area contains approximately 92 miles of secondary roads, only a small fraction of which are located on BLM-administered lands. Access to public lands is by boat, airplane, or snowmachine, though some areas are accessible by automobile or off-road vehicle.

The planning area includes portions of the upper Alaska Peninsula north of Becharof Lake and Egegik Bay, and the adjacent area of upper Bristol Bay northwesterly to Jacksmith Bay, northerly to the headwaters of the Togiak River, Tikchik River, King Salmon River, Nushagak River, Mulchatna River, Tlikakila River, and Pile River drainages, westerly to the west side of Iliamna Lake and Kakhonak Lake, and southerly along the spine of the Alaska Range and the Aleutian Range.

Though there are approximately 23 million acres within the Bay planning area, only 3.6 million of those acres are managed by the BLM. Those 3.6 million acres include 1.7 million acres of unencumbered BLM lands, 979,000 acres of Native-selected lands, and 915,000 acres of State-selected lands. Because of overselections, portions of the Native- and State-selected lands will ultimately be retained as public land.

The planning area includes lands administered by the State of Alaska (State), Native Corporations, the National Park Service (NPS), U.S. Fish and Wildlife Service (FWS) and private land owners. Table 1 on page 3 displays the land ownership status within the planning area by acre, and the Bay RMP Generalized Land Status map on page 4 illustrates the land ownership patterns.

Table 1. Land Status Within the Bay Planning Area

Land Status	Acres
BLM (unencumbered)	1,678,000
U.S. Fish and Wildlife Service	4,079,000
Military	14,000
National Park Service	4,047,000
Native (ANCSA*) lands	2,774,000
Native-selected lands	979,000
Native allotments	127,000
Private	1,000
State patent or TA**	8,560,000
State-selected lands	915,000

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

* Alaska Native Claims Settlement Act

** Tentatively Approved

C. Description of the Scoping Process

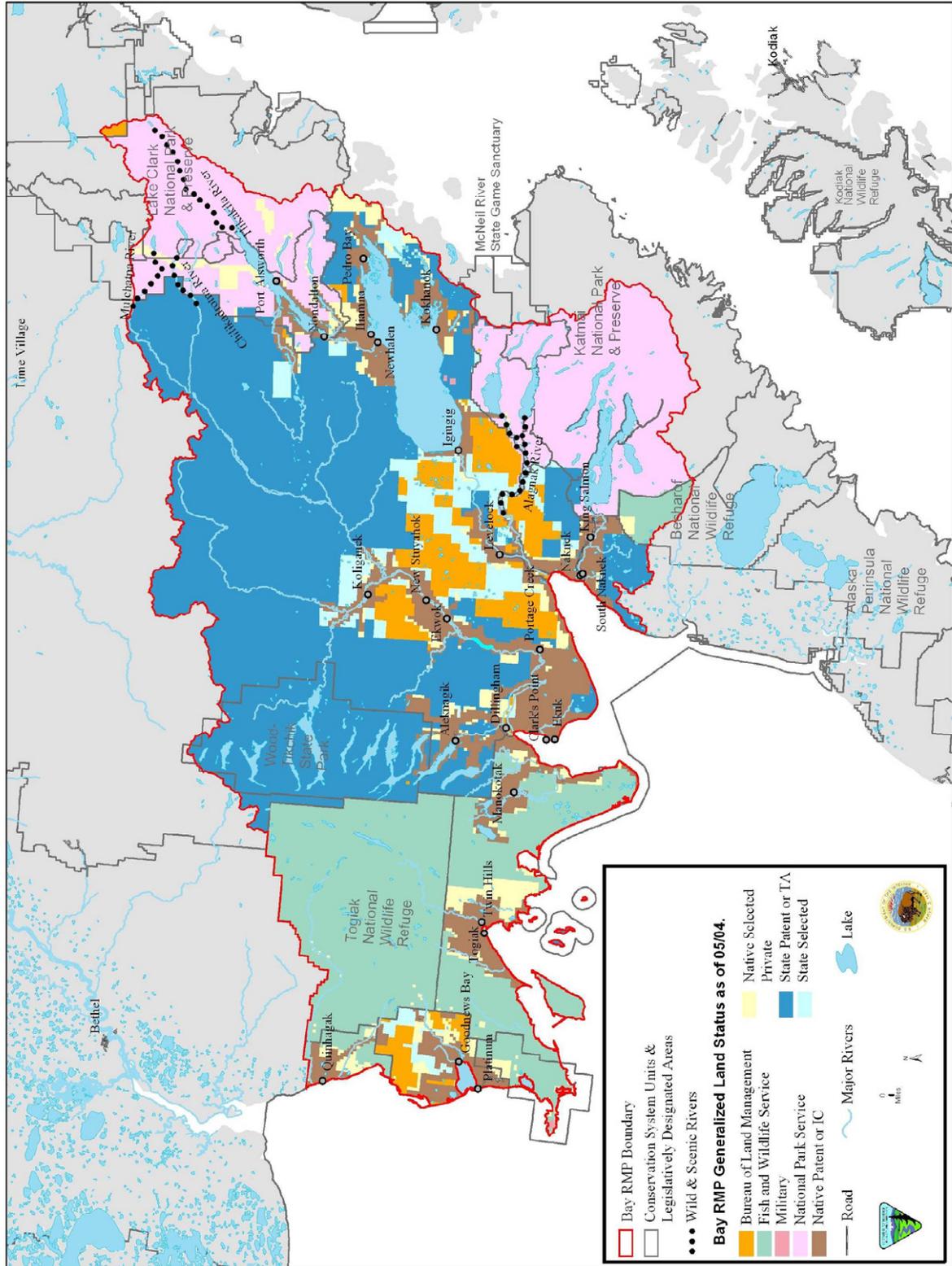
A Notice of Intent (NOI) to prepare the Bay RMP/EIS was published in the Federal Register on December 6, 2004. The formal scoping period began at the beginning of January 2005 and extended until the end of March. Public meetings were held during the formal scoping period in the larger communities of Dillingham, Anchorage, Soldotna, and Homer, as well as in the smaller communities of Aleknagik, Koliganek, Iliamna, and Naknek.

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

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

The meeting facilitator gave a brief introduction, presented each planning criterion, and elicited public comment on that criterion for BLM-managed lands.

Figure 1. Bay RMP Generalized Land Status Map



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For a list of planning criteria, see Section III, Planning Criteria, on page 27. Meeting participants had an opportunity to identify issues and concerns associated with each criterion and ask questions. Each session ended with an opportunity for comments and questions on any topic the public felt had been overlooked during the meeting. At each meeting, the meeting facilitator had several general maps of the Bay planning area available for review.

The BLM also involved the public in the planning process and solicited input by giving the scoping presentation to various groups at their request and by presenting information about the planning process at various other meetings open to the public. Presentations were given at the Togiak National Wildlife Refuge, Alaska Peninsula/Becharof National Wildlife Refuge, Katmai National Park and Preserve, Bristol Bay Native Corporation (BBNC), and Calista Corporation. The BLM met with Bristol Bay Native Association management and staff on two occasions, attended a BBNC workshop, met with Choggiung managers and staff on two occasions, contacted and met with BLM Resource Advisory Committee members, met with FWS Anchorage Regional Office planning staff, and visited with King Salmon Native Association managers. During these meetings, the BLM provided information about the planning project, provided background material on the planning effort, and invited input and comments regarding issues and concerns. Additional written comments received by mail and by email during the scoping period have been incorporated into this scoping report.

Concurrent with the beginning of the scoping period in January 2005, the BLM developed a Bay RMP/EIS planning website. The website has included the schedule of public meetings and general schedule for the Bay planning process. An overview of the Goodnews Block portion of the 1981 Southwest Management Framework Plan was also available on the website. At this time, however, many BLM websites are unavailable due to unscheduled maintenance. It is unknown when the Bay RMP/EIS website will be back online, but once it is, all planning-related documents, including this Scoping Report, will be available for online viewing.

D. Cooperating Agencies/Invitees

Other Federal agencies and traditional Native villages with interest and/or special expertise were invited to become Cooperating Agencies. While the U.S. Air Force expressed initial interest, no agencies entered into formal Cooperating Agency status. However, all of the agencies administering lands within the Bay planning area and most of the traditional village councils expressed great interest in continuing to be involved and informed in a less formal capacity.

The State of Alaska and the BLM have developed a strategy for interagency cooperation and consultation on land use planning efforts. As part of this strategy, the State of Alaska and the BLM jointly fund a liaison position. The BLM requested State input into the Bay scoping process by contacting the State of Alaska liaison office by

letter on December 30, 2004. On February 11, 2005, consolidated scoping comments were received from the State.

Major groups and stakeholders as well as members of the public known to be interested or affected by the Bay RMP are listed below. Additional stakeholders will be identified throughout the planning process. In December 2004 letters were mailed to all of the entities listed below (sections 1-8) requesting their input into the scoping process.

1. Special Interest Groups, Agencies, and Corporations

The following groups were initially contacted by mail at the time the NOI was published. These groups may provide additional data and may represent many of the users of BLM lands within the Bay planning area. Opportunities for input from these groups will be available during scoping, during participation at public meetings, and during the public comment period. BLM staff further contacted or met with those groups indicated with an asterisk.

- Alaska Anthropological Association*
- Alaska Miners Association*
- Alaska Center for the Environment
- Alaska Coalition
- Alaska Resource Advisory Council*
- Alaskans for Responsible Mining*
- Association of Village Council Presidents
- Association of Village Council Presidents
- Bristol Bay Economic Development Corporation
- Bristol Bay Native Association*
- Bristol Bay Native Corporation*
- Calista Corporation*
- Coastal Villages Region Fund
- Cook Inlet Region, Incorporated*
- Cook Inlet Tribal Council, Incorporated
- Friends of Bristol Bay*
- Kuskokwim Native Association
- Lower Kuskokwim Economic Development Council
- National Land Rights League
- Natural Resources Defense Council
- Nushagak-Mulchatna Watershed Council*
- Nushagak/Mulchatna-Wood/Tikchik Land Trust
- Southwest Alaska Municipal Conference (SWAMC)
- The Nature Conservancy*
- The Nushagak Mulchatna Watershed Council
- The Sierra Club
- The Wilderness Society

2. Federal and State Government Agencies

All of the agencies listed below received an initial letter at the time the NOI was published inviting them to an agency scoping meeting. Many of these agencies are providing additional data needed for planning. Their input is needed to ensure coordination across land management boundaries and consistency with other plans. These agencies have had opportunities to provide input during the scoping period, and will have additional opportunities throughout the planning period, including during development of the alternatives, at public meetings, and during the public comment period. A representative of the State of Alaska Department of Natural Resources attends bi-weekly Bay interdisciplinary team meetings at the Anchorage Field Office. BLM staff further contacted or met with those groups indicated with an asterisk.

Alaska State Historic Preservation Office
 Bristol Bay Borough
 Coastal Zone Management

- Bristol Bay Borough*
- Bristol Bay CRSA
- Cenaliulriit CRSA

Lake and Peninsula Borough*
 National Park Service*
 State of Alaska, Alaska Department of Fish and Game*
 State of Alaska, Department of Natural Resources*
 State of Alaska, Department of Transportation and Public Facilities
 U.S. Army Corps of Engineers
 U.S. Fish and Wildlife Service*

3. Adjacent Land Owners and Managers

The following land owners and managers were informed about the Bay RMP/EIS planning process by mail at the time the NOI was published. Follow-up visits were made to the Alaska Peninsula/Becharof National Wildlife Refuge, Katmai National Park and Preserve, Lake Clark National Park and Preserve, and Togiak National Wildlife Refuge. Telephone calls were made and/or letters, emails, and faxes were sent to Bristol Bay Borough, Lake and Peninsula Borough, and the U.S. Air Force. Adjacent private landowners were informed by public announcements in the newspapers and on local radio stations. They will continue to be kept up-to-date regarding the ongoing planning process to ensure coordination across land management boundaries and to ensure consistency with other planning efforts. Opportunities for input have been provided during the scoping period and at public meetings. Opportunities for input will continue to be available throughout the planning process. These land owners and managers include:

Alaska Peninsula/Becharof National Wildlife Refuge
 Bristol Bay Borough
 Katmai National Park and Preserve and Alagnak Wild River

Lake and Peninsula Borough
Lake Clark National Park and Preserve
McNeil River Game Sanctuary
Private landowners
Togiak National Wildlife Refuge
U.S. Air Force
Wood-Tikchik State Park

4. Regional and Village Native Corporations

Regional and Village Native Corporations were initially informed by mail of the start of the Bay RMP/EIS project and initial scoping period at the time the NOI was published. Three representatives from the Anchorage Field Office attended the BBNC Village Leadership Workshop in Anchorage on December 6, 2004, where they informally met with leaders from many of the Bay region villages and provided them with information about the Bay RMP. Formal meetings on the Bay RMP where PowerPoint presentations were given and comments and questions were taken took place on February 24, 2005, at BBNC headquarters and on March 2, 2005, at Calista, Incorporated headquarters in Anchorage. Maps relevant to each corporation's concerns and informational handouts were provided. Three additional informal meetings were held with representatives of Choggiung, Ltd., and informational maps were provided to representatives of PaugVik Incorporated, Ltd. at their request. Continuing dialogue and provisions for opportunities for input will take place throughout the planning process. On three occasions, follow-up contacts through telephone calls and faxes were made with the village corporations in Quinhagak, Goodnews Bay, and Platinum. Regional and Village Native corporations contacted include:

Alaska Peninsula Corporation
Arviq, Incorporated
Becharof Corporation
Bristol Bay Native Corporation
Calista Corporation
Choggiung, Limited
Cook Inlet Region, Incorporated
Ekwok Natives Limited
Igiugig Native Corporation
Iliamna Natives Limited
Kijik Corporation
Koliganek Natives Limited
Kuitsarak, Incorporated
Levelock Natives Limited
Manokotak Natives Limited
Olsonville, Incorporated
PaugVik Incorporated, Limited
Pedro Bay Native Corporation
Qanirtuuq, Incorporated

Saguyak, Incorporated
 Stuyahok Limited
 Togiak Natives Corporation
 Twin Hills Native Corporation

5. Government to Government Consultation

Federally-recognized Tribes have a special, unique legal and political relationship with the Government of the United States as defined by the U.S. Constitution, treaties, statutes, court decisions, and executive orders. These definitive authorities also serve as the basis for the Federal Government's obligation to acknowledge the status of Federally-recognized Tribes in Alaska. As such, it is the policy of the BLM to formally consult with Federally-recognized Tribes in Alaska prior to taking action or undertaking activities that will have a substantial, direct effect on the Tribes, their assets, rights, services, or programs. To this end, on December 23, 2004, letters requesting government-to-government consultation were sent to the 22 Tribes within the planning area listed below. Follow-up faxes were sent to the presidents of the traditional councils in the Dillingham, King Salmon, and Iliamna areas in late December through February, just prior to the scoping meetings held in each of those localities. These faxes invited Tribal representatives and their community members to the scoping meetings. Additionally, a series of follow-up telephone calls were made to further extend the invitations and to answer questions. Over 45 people attended the Dillingham scoping meeting, and representatives from many of the surrounding villages attended. Similar follow-up has been used for the villages of King Salmon, Naknek, South Naknek, Iliamna, Newhalen, Nondalton, Aleknagik, Igiugig, New Koliganek, New Stuyahok, Quinhagak, Goodnews Bay, and Platinum. Consultation will continue to take place with Federally-recognized traditional governments throughout the planning process in order to identify and consider Tribal concerns with regard to all BLM resource management programs. This consultation will provide additional data needed for planning. Consultation will provide input from Alaska Natives and Tribes. These groups may provide additional data on Traditional Cultural Properties and subsistence uses in the planning area. Traditional councils outside of the Bay planning area whose Tribal members use BLM lands within the Bay planning area for subsistence are also being consulted. Tribal entities contacted include:

Aleknagik Traditional Council
 Curyung Native Village Council
 Egegik Village Council
 Ekwok Village Council
 Igiugig Village Council
 Iliamna Village Council
 King Salmon Village Council (Savonoski)
 Kokhanok Village Council
 Levelock Village Council
 Lime Village Traditional Council

Manokotak Village Council
Naknek Village Council
Native Village of Goodnews Bay
Native Village of Kwinhagak
New Koliganek Village Council
New Stuyahok Traditional Council
Newhalen Tribal Council
Nondalton Tribal Council
Pedro Bay Village Council
Platinum Traditional Village
Portage Creek Village Council (Ohgsenakale)
South Naknek Village Council (Quinyang)
Togiak Traditional Council
Twin Hills Village Council

6. Community Participation

Besides their participation in the scheduled scoping meetings, Bay team members met with and/or have continued communicating with community members from Aleknagik, Dillingham, Goodnews Bay, Igiugig, Iliamna, King Salmon, Levelock, Naknek, New Stuyahok, Newhalen, Nondalton, Platinum, Kwinhagak, and South Naknek. Individuals from these and other communities within the planning area may provide additional data needed for planning purposes. Native Villages may provide additional data on Traditional Cultural Properties and subsistence uses. Opportunities for their participation was provided at scoping meetings, public meetings, and during the public comment period, and will continue to be afforded throughout the planning process. Communities (including some outside the planning area whose members use the Bay planning area lands for subsistence) contacted include:

City of Aleknagik
City of Clark's Point
City of Dillingham
City of Egegik
City of Ekwok
City of Goodnews Bay
City of Manokotak
City of New Stuyahok
City of Newhalen
City of Nondalton
City of Platinum
City of Quinhagak
City of Togiak
Igiugig
Iliamna
King Salmon
Kokhanok

Levelock
Lime Village
Naknek
Pedro Bay
Port Alsworth
Portage Creek
South Naknek
Twin Hills

7. BLM Resource Advisory Councils

The BLM Alaska Resource Advisory Council (RAC), which advises the State Director and may make recommendations to the Field Managers, will provide a broad spectrum of input from various interests. The advisory council was informed by mail about the beginning of the Bay RMP/EIS project at the time the NOI was published. Brochures, project area maps, and briefing materials were provided to Council members. The Bay Planning Team Leader met with interested RAC members on March 2 and March 22, 2005, to provide briefings and maps and to answer questions. The Anchorage Field Office Field Manager provides RAC members with an update on the Bay RMP on a quarterly basis. Opportunities for input will continue to be made available at advisory council meetings and throughout the planning process.

8. Subsistence Regional Advisory Councils

Subsistence Regional Advisory Councils, which advise the Federal Subsistence Board, include representation from communities across the Bay planning area and will provide a forum for input from local residents, particularly regarding subsistence use. The advisory council was informed by mail about the beginning of the Bay RMP/EIS project at the time the NOI was published. Follow-up for the subsistence councils was in the form of emails and telephone calls to the regional coordinators for each subsistence advisory council. Brochures, project area maps, and briefing materials were provided to the councils. One subsistence regional advisory council member attended the Soldotna scoping meeting and provided valuable comments. Opportunities for input will continue to be made available at advisory council meetings and throughout the planning process. These councils include:

Bristol Bay Subsistence Resource Advisory Council
Southcentral Subsistence Resource Advisory Council
Yukon-Kuskokwim Delta Subsistence Resource Advisory Council

E. Media

Use of local media is essential in providing adequate public notice for the varying stages of the planning process. Radio and print media of local and statewide circulation were used to disseminate information concerning the scoping meeting schedule. The BLM

has utilized the following radio stations and newspapers for announcements of public scoping meetings:

Alaska Public Radio Network (APRN)
Delta Discovery
KAKN Radio (Naknek)
KDLG Radio Station (Dillingham)
KRUP Radio (Dillingham)
KYKD FM Radio (Bethel)
KYUK AM Radio (Bethel)
The Anchorage Daily News
The Bristol Bay Times
The Tundra Drums

II. Comment and Issue Summary

A. Summary of Public Comments

This section summarizes public comments that have been received in response to scoping, including those provided at meetings and those submitted in writing. For a full listing of scoping comments, see Section VII, Scoping Comments, on page 31.

1. Natural, Biological, and Cultural Resources

a) Water

Water quality and air pollution concerns were the most frequent comments received on soil, water, and air issues. During scoping, the Anchorage Field Office received an invitation to participate on the Nushagak-Mulchatna Watershed Council. Commenters expressed concerns with the potential of future development of solid mineral resources to contaminate rivers and groundwater in the planning area. Commenters indicated that they believed protection of water quality should be a high priority for the BLM and that water is the key resource in Bristol Bay. All subsistence resources (including salmon), as well as humans, rely on water, and all may be endangered by polluted water. Commenters requested that the RMP address the BLM's management of water quality, and that the BLM use the Nushagak-Mulchatna Watershed Council Report in the planning process, noting the prioritization of locations within the watershed for resource protection. Other commenters requested that the RMP address water rights, and noted that development or disposal of BLM lands may affect downstream conditions.

b) Air Quality

Comments were made that potential solid mineral resource development will contribute to airborne dust, potential transmission, and deposition of toxic materials miles from their source. Commenters requested that the BLM include air quality in the planning process scenario and describe seasonal prevailing

winds in the area of proposed solid mineral development. Commenters remarked that transport and deposition of volcanic ash from prior volcanic activity provides an example of how dust from potential mining operations might be deposited, and that there are other threats to air quality besides the use of diesel fuel.

c) Soil

The few comments regarding soil addressed concerns about riverbank erosion on the Branch River and other rivers due to jet boat motor wash, concerns for potential erosional issues as they may affect archaeological sites, and concerns for coastal erosion in Bristol Bay on BLM-managed lands beyond State jurisdiction.

d) Vegetation

The BLM received comments related to maintaining fish, wildlife, and vegetative habitats in their natural condition; protecting riparian habitat; and preventing the spread of noxious and invasive plant species. One commenter recommended checking with local residents on the condition of the vegetation on BLM-managed lands in their areas. One commenter, a subsistence user, wished to see the berry patches on BLM-managed lands remain undisturbed. Another commenter pointed out that the Bay planning area contains edible and medicinal plants, and that the use of vegetation for commercial pharmaceutical purposes needs to be carefully monitored. The BLM was encouraged to implement a strategy to prevent the spread of noxious and invasive plant species, especially in consideration of potential mineral entry and/or development.

e) Special Status Species

The few comments that were received specific to special status species were related to requests that the BLM identify those special status species occurring in the planning area, and address their management in the RMP.

f) Fish and Wildlife

The majority of comments received addressed fish and wildlife as they relate to subsistence, sport hunting and fishing, and commercial activities involving fish and wildlife. Comments pointed out the unique nature of the region in regard to fish and wildlife populations and the natural environment. Commenters urged preservation of the fish and wildlife inhabiting the area, and protection of the habitats within the Bay planning area. Commenters highlighted the potential clash between maintenance and use of these resources and development of mineral resources and infrastructure in the Bay planning area.

Fish-specific

Commenters recognized the world-class status of the river systems within the Bay planning area as spawning and rearing habitat for the five species of salmon and for other anadromous and freshwater fish species. Salmon are the single most important species for subsistence users.

There is a great deal of concern that this habitat be retained intact. Additionally, specific rivers and streams were identified for their importance (see detailed comments in Section VII, Scoping Comments, beginning on page 31).

Wildlife-specific

The BLM received many comments relating to habitat management for important subsistence species such as caribou and moose. This issue also proved to be one of the most important themes at each of the public meetings held in the region, as well as a common theme in written comments. Several comments noted that the planning area includes important habitats and migration routes for moose and for the Nushagak and Mulchatna caribou herds. Twenty-four villages in and adjacent to the planning area depend on these resources. Comments reflected the serious concerns of subsistence and recreational users about various kinds of development on BLM-managed lands, including development of infrastructure to support industry. Commenters recommended an ecosystem management approach to habitat management.

BLM-managed lands adjacent to the Alagnak River provide winter range for the Mulchatna caribou herd. According to commenters, this area has been heavily impacted. There is a caribou migration route through Koliganek in the fall, though residents commented that caribou have been taking a different route in recent years. Villagers also reported that airplanes have been hazing caribou.

Commenters were interested in the BLM working with others to discuss enhancement of moose and caribou populations, and to carefully track wildlife populations. Commenters in the villages repeatedly mentioned the increased presence of wolves and bears near their villages, and the inroads those species were making in the moose and caribou populations. The BLM was specifically encouraged to work with Togiak National Wildlife Refuge in adopting consistent conservation objectives to protect the Nushagak and Mulchatna caribou herds.

g) Cultural Resources

Commenters requested that the BLM identify areas with cultural resources and consult with the nearest village or tribe to find out what their wishes are with respect to treatment of cultural resources in their area. Commenters asked that the BLM define a cultural resource management strategy in the alternatives for the Bay RMP. Commenters stressed that protective measures for cultural resources are necessary in conjunction with proposed development. The State commented that when any Federal undertaking (including any action funded or authorized by the Federal government) with the potential to directly or indirectly affect any archaeological or historic site is planned, a consultation with the State Historic Preservation Office must be initiated per Section 106 of the National

Historic Preservation Act. The State requested that the State Historic Preservation Office be notified if archaeological or historic sites are identified through this planning process. If sites are identified in the project area, their significance should be evaluated to determine their eligibility for inclusion in the National Register of Historic Places. The State may request that recreational or commercial uses be precluded in order to protect archaeological and historic sites. Commenters requested that the BLM provide protection of known cultural sites on BLM-managed lands that are being impacted by recreational activities.

h) Visual Resources

Many commenters requested that the BLM retain the scenic quality of the land within the Bay planning area, and indicated that the area's wild quality was one of the primary features sought by outside visitors. Other comments recommended avoiding development, but requiring restoration of the environment should development occur.

i) Wildland Fire Management

In the last few years, some concerned residents of the Bay planning area have noticed a warming and drying trend in the planning area, a lowering of the water level in some rivers, a bark beetle infestation in certain areas, and an increase in conditions that may lead to greater incidence of wildfire in a region that has historically seen few natural fires due in part to the area's marine influence. One commenter suggested the use of controlled burning on BLM-managed lands in response to the spruce bark beetle die-off. Koliganek residents also noted that the region is experiencing a drying trend. Due to the dryness of the environment, there is an increased fire hazard, and residents are experiencing more fires in their area. Commenters requested that the BLM be clear about the fire management plan for BLM-managed lands around villages in the Bay planning area, and clarify how the fire management plan will be incorporated into the planning process. Commenters asked that the plan address fire, fire suppression zones, and fire management, including provisions for letting fires burn and for protecting or propagating wildlife habitat.

The State requested that fire management planning decisions for BLM-managed lands be made through the existing process detailed in the Alaska Interagency Wildland Fire Management Plan, and that all fire management requests for active fires on BLM-managed lands also be made through the existing process. The State noted their specific need for an updated fire plan to address the significant impacts of the spruce bark beetle infestation along the eastern shore of Lake Iliamna, including the area around Kokhanok. The State commented that updated vegetation mapping for the purposes of identifying fire fuels would be beneficial in this planning exercise.

j) Paleontology

Comments regarding paleontological resources were similar to those for cultural resources. Commenters requested that the BLM identify paleontological

resources on BLM-managed lands and provide a paleontological resource management strategy in the alternatives for the Bay RMP. Commenters stressed that protective measures for paleontological resource management need to be included as a strategy in the alternatives for the Bay RMP, with an emphasis on protective measures for paleontological resources that are necessary with proposed development. Commenters requested that the BLM provide protection to known paleontological sites that are being impacted by recreational activities.

k) Wilderness Characteristics

Although a wilderness review or inventory is outside the scope of the Bay RMP, commenters requested that the BLM protect all wilderness values until such time as they can be properly inventoried and studied for potential designation. While some commenters called for wilderness review and designation, others suggested that decisions about wilderness designations be left to local residents. If impacts to wilderness characteristics are anticipated, commenters recommended that the BLM conduct meetings to gather recommendations from the public for implementing special designations. Commenters noted that the area between the Kvichak and Nushagak rivers has wilderness values.

l) Forestry

Only a few comments were received related to forestry. Residents of Iliamna and Aleknagik reported spruce bark beetle and leaf miner infestations in their regions. Aleknagik residents requested that the BLM indicate the wood cutting and wood gathering policy for BLM-managed lands, especially in light of the insect infestations. Commenters recommended the BLM use caution in managing beetle-killed forests, address management of slash cleanup, and encourage natural reforestation. Prior interest in developing a timber-based industry in the Bay planning area was not sustained because the nature of the forests and the remoteness of the stands made such a venture uneconomical. Iliamna Natives Ltd. requested assistance from the BLM in contacting agencies who can assist with salvaging timber.

m) Livestock Grazing

No comments were received regarding livestock grazing, nor was any interest indicated in reindeer grazing.

n) Subsistence

Many comments were received on subsistence. Many people requested that subsistence be made a priority in the plan and on BLM-managed lands, that subsistence resources and the subsistence way of life be protected, that important subsistence use areas be identified, and that impacts on subsistence from other uses be monitored. Subsistence use area maps published by the Alaska Department of Fish and Game in the 1980s and 1990s for each village were provided at Bay scoping meetings. Many commented that the maps need to be updated. Some communities provided current information about

contemporary subsistence use areas. Iliamna residents noted that they were seeing a decline in moose, caribou, and salmon populations. Commenters placed a great deal of emphasis on the salmon fisheries and the importance of maintaining the health of the Bay area rivers that provide salmon spawning habitat. Catch and release fish should be treated as subsistence food resources. Commenters recommended educating people to the subsistence customs of the local people. Development of infrastructure (e.g., connecting roads) was seen as being both positive for access to subsistence resources and potentially negative as a source of user conflict. There is concern about competition between subsistence hunters and sport hunters. Commenters expressed interest in co-management of lands and resources between the BLM and the Tribes.

Some comments expressed concern about the impacts to subsistence users from lodges, guiding, and transporting activities on State lands adjacent to BLM-managed lands.

One comment that was outside the scope of the RMP related to the impacts on subsistence from U.S. Air Force low flying aircraft.

o) Recreation and Visitor Services

Many comments addressed the impacts of recreational use of BLM-managed lands on subsistence resources and uses. Commenters encouraged the BLM to continue to manage recreational use for the long-term as a balanced process that includes wildlife, habitat, and humans. Several comments stated that the BLM should set limits of acceptable use and identify an appropriate number of outfitter/guide permits for the planning area and, if possible, address the issue of air taxis and transporters. Areas of specific concern include BLM-managed lands in the Lake Iliamna area and in the Nushagak River drainage. Commenters expressed an expectation that user conflicts will be expressly addressed in the RMP. A partnership program for moose similar to the one in Aniak was proposed.

Related to the conflict between recreation and subsistence hunting were several comments mentioning the need for increased efforts to determine who is using BLM lands. Other needs that were stressed included enforcement of land-and-shoot regulations; enforcement of regulations regarding airplanes harassing wildlife; use of permitting to control conflicts among users; and education of recreational users on local culture, to include game movement, hunting techniques, elimination of wasteful practices, avoidance of water contamination from human waste, respect for private land, and protection of historic and prehistoric archaeological sites.

Other commenters addressing recreation mentioned the need for signing BLM lands. Many commenters indicated confusion regarding identifying BLM lands, and differentiating them from private lands.

p) Comprehensive Trails and Travel Management; Access

Comments related to access were primarily related to accessing subsistence resources via traditional methods of transportation (OHVs), and in providing access to traditional subsistence hunting/gathering areas by means of 17(b) easements.

Delineating Travel Management Areas

Commenters noted that developing access in the form of constructing interconnecting roads will change the character of the region, which at present contains only three short omnibus roads. Those commenters who reside in the region expressed little interest in developing roads in traditional subsistence use areas; rather, their primary interest was in 17(b) easements providing OHV access. One commenter noted that the existence of boundaries of different landowners and land managers hinders access development due to the need to work with a number of different entities, all potentially having different land management goals and strategies. Commenters recommended that the BLM plan to mitigate potential impacts from future regional access development projects.

A number of comments favored development of a road or railroad from the Naknek-King Salmon or Iliamna area to Anchorage or to the Interior Railbelt, and development of a bridge from Naknek to South Naknek. Commenters noted that aircraft access to BLM-managed lands is largely unregulated. This unregulated access was identified as a source of multiple use conflicts in the planning area.

A number of commenters requested that the BLM address the BLM process for obtaining access to BLM-managed lands. Among other reasons for evaluating this process, the fragmented nature of the BLM lands themselves creates access problems. Commenters recommended consolidating these lands, and requested that the BLM clearly lay out the BLM's plan for providing access to these remote parcels (e.g., 17(b) easements). Some Native corporations would like to work cooperatively with the BLM in identifying and mapping out existing trails, routes, and easements, and are anxious to complete these tasks. The RMP should contain these maps with the completed information. Commenters noted that it is critical to work out any problems that may exist so as to allow for public access. In this effort, commenters recommended that the BLM go to each village to identify and protect historic and prehistoric cultural properties, including burial sites, from impacts. Commenters stressed the need to work with neighboring land owners and land managers to address compatibility and suitability issues, and noted that some land owners don't want 4-wheelers on their lands.

Commenters noted the differences in the ability to access BLM-managed lands between most traditional subsistence users and the more affluent segment of the hunting population, a difference often tied to the differences in equipment. Commenters also requested that the RMP consider the future development of utility corridors, and plan to mitigate impacts from future regional access development projects.

Designation of Off-highway Vehicle Management Areas

Comments relating to OHV designations ranged from recommendations to designate BLM lands as “open” with no restrictions on OHV use, to recommendations to designate BLM lands as “limited,” with use restricted to existing trails, or restrictions in particular areas and/or seasonal restrictions as needed.

q) Minerals

Comments on mineral development were mixed, with some favoring mineral development but the large majority opposing mineral exploration and development. The most frequently expressed concern was the conflict between subsistence resources and mineral development. Related comments on (d)(1) lands were also mixed, with some requesting removal of withdrawals from (d)(1) lands but the majority requesting retention of the withdrawals. Several comments requested good maps showing the location of BLM surface and subsurface estate and (d)(1) lands.

Coal and Oil Shale

The sole comment received regarding coal was related to granting the State authority to implement the Surface Mining Control and Reclamation Act (1977) if coal resources were to be developed in the planning area.

Fluid Minerals (Oil and Gas, Tar Sands, Geothermal Resources, and Coal Bed Methane)

Comments on this topic ranged from those in favor to those not in favor of fluid mineral exploration and development. Of the former group, commenters stressed the need for careful planning and use of minimum-impact technology, establishment of careful controls, and establishment of contingency plans. Commenters also expressed interest in local sources of inexpensive energy. Currently there are no State leases in the Bay planning area. Though exploration may occur in the future, commenters who are involved in potential development suggested that given current knowledge of the geology of the planning area, better prospects lie on the central and lower Alaska Peninsula (outside of the Bay planning area).

The State is encouraging oil and gas development in Alaska and would like to review any proposed action that may limit or discourage exploration and development. The existing Southwest MFP, which only covers the Goodnews Block of the Bay planning area, calls for opening all BLM-

administered public lands to oil and gas leasing under Section 1008 of ANILCA. Some of the comments received during scoping suggest that this recommendation may need to be reevaluated.

With regard to coal bed methane, one commenter recommended that the BLM seek extensive public input and develop stringent mitigation guidelines before allowing development of that resource.

Locatable (Solid) Minerals, Mineral Materials, and Non-energy Leasable Minerals

Comments on this topic were varied, ranging from a few in favor of mineral exploration to the majority in opposition to mineral exploration. The development of infrastructure in support of mineral development was a concern with many who foresee far reaching changes in the traditional subsistence lifestyle for the rural residents of the Bay planning area. There were several comments requesting that the BLM review existing (d)(1) withdrawals and determine if they are still valid. Other comments requested that the BLM retain the existing (d)(1) withdrawals. Some comments noted specific areas that should be either open or closed to mineral entry. Some comments noted the need for development and enforcement of stipulations for mining activities. Currently there are two areas of BLM unencumbered lands within the Bay planning area where mineral development either has occurred in the past or is planned to occur.

r) Lands and Realty

There were a variety of comments on realty. A common request was that the BLM sign its lands. Commenters also requested that the RMP include good, accurate maps that identify land ownership and BLM surface and subsurface estate and (d)(1) lands.¹ One commenter suggested taking into consideration the value of the lands that may be impacted by development, and consider a trade for equivalent lands elsewhere. Another commenter requested that the RMP contain a discussion on whether or not the BLM has a land acquisition program.

Comments opposed lands being made available for disposal. If lands were made available, it was recommended that, in fairness to everyone, the same restrictions that were originally applied to Native applicants be applied to present disposals. Some comments favored State and Federal land exchanges to

¹Section 17(d)(1) of ANCSA withdrew all unreserved lands from certain uses such as oil and gas development or solid mineral development. The provision specified that any further withdrawals would require an affirmative act by the Secretary of the Interior. ANCSA also authorized the Secretary to classify the lands in such additional withdrawals and to open the lands to appropriation and disposal under the public land laws. Pursuant to the section, virtually all lands in Alaska were withdrawn. The purpose of the (d)(1) withdrawals was primarily to maintain the status quo in order to complete studies and reviews for the purpose of assessing values for classification by the BLM, which is now being done through the land use planning process.

consolidate BLM lands. One commenter asked how disruptive the disposal of BLM lands would be to the management and/or ownership of other lands given the fragmented nature of the BLM lands, and urged caution in proceeding.

2. Planning

The central themes of the comments that addressed planning included an emphasis on taking a long-term view when making planning decisions, managing public lands in accordance with multiple use mandates, and being consistent in land management practices with neighboring lands managed by other agencies or entities.

Commenters recommended using consistent land classifications for BLM and adjacent lands to avoid confusion. Commenters called for involving the people in the Bay planning area at the grass roots level, including the schools, for training, and putting people in the field. There was a recommendation to make the RMP user-friendly and to use plain English. Commenters suggested developing a management plan that accommodates the diverse needs of all public land users and balances the needs for economic development with sustainable resource conservation. Conservation measures should not work against the subsistence needs of residents and local subsistence users. There should be information included in the RMP as to how the RMP will be implemented. Commenters recommended releasing a summary of preliminary alternatives for public review prior to the release of the Bay Draft RMP. The State of Alaska requested that the BLM fully recognize the State's authorities and avoid making decisions that unnecessarily encumber State-selected lands, particularly those identified as a high priority for conveyance. The plan should not develop management intent for these State-selected parcels that deviates significantly from existing Alaska Department of Natural Resources land use plans.

3. Special Designations

Comments regarding special designations addressed wilderness, Wild and Scenic Rivers, and a variety of other designations available to the BLM. At scoping meetings, the BLM clearly stated that a wilderness inventory and recommendations for wilderness designations would not be addressed in the plan based on direction from the Secretary of the Interior. Regardless, some commenters strongly urged the BLM to recognize wilderness as a resource category.

Commenters recommended that special designations should be consistent for Federal and adjoining lands wherever possible. Commenters recommended identifying nationally significant areas on BLM-managed lands in the planning area. While some commenters called for wilderness review and designation, others suggested that decisions about wilderness designations be left to local residents. They recommended that if impacts are anticipated, meetings should be held to gather recommendations for implementing special designations. Commenters noted that the area between the Kvichak and Nushagak rivers has

wilderness values. Commenters recommended making designations specific to particular areas as needed. For example, if the area around Kokhanok has a problem with bear poaching, a special bear management area might be appropriate.

Many commenters identified Bristol Bay drainages in general as special areas because of Bristol Bay's priority fish species, salmon, and other anadromous fish. The Goodnews Bay area has special species of birds whose populations need to be protected. Commenters called for focusing on identifying critical wetland and water habitat areas, and identifying candidate Wild and Scenic Rivers. Other commenters, referencing their experiences with the Alagnak River, recommended not applying Wild and Scenic status to rivers unless it becomes clear that they need special protection. Several commenters recommended that Kaskanak Creek be designated critical fish habitat and as a critical habitat area for moose, beaver, and migratory birds. Many believed that special designated areas need to be protected by the BLM.

Other areas suggested for special designation include Kokhanok Lake, BLM-managed lands adjacent to the Alagnak River, and the Mulchatna caribou herd wintering range. The Goodnews coastal areas were recommended for special designation based on the presence of special bird habitat.

The following rivers were suggested for evaluation for Wild and Scenic River designation: lower Alagnak River, Kaskanak Creek, Ben Courtney Creek, Ole Creek, Koggiling Creek, Klutuk Creek, Upper Talarik Creek, Iliamna River, South Fork Goodnews River, Middle Fork Goodnews River, Barnum Creek, Tivyagak Creek, and Puyulik Creek.

4. Support

Cadastral, Interpretation and Environmental Education, and Transportation Facilities

Comments falling into these categories were covered under other headings above.

B. Issues Identified During Scoping

The following issues were identified during scoping and through internal Planning Team review. A planning issue is identified 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. The 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.

- Mineral exploration and development on BLM-administered lands and the potential for associated impacts to habitat, subsistence resources, and subsistence practices.
- Management of BLM-administered lands in a way that will provide sustainable habitat and continuing opportunity and access to BLM-administered lands for commercial, subsistence, and sport users.
- Mineral withdrawal, location, and status of (d)(1) lands.
- Management of recreational use of BLM-administered lands.
- Access to BLM-administered lands.
- Special management area designations.

Many other management concerns were identified during scoping. A management concern is an apprehension or point of dispute involving a resource management activity or land use where the relationship between the activity or use and potential undesirable effects is apparent but not well defined. Generally a concern is of note to a few individuals, as opposed to a planning issue, which is of general importance. Many of these concerns will be addressed in the plan but did not have a high enough level of controversy to be raised to the issue level.

C. Anticipated Decisions to be Made

This section describes the type of decisions that will be made in the RMP. These decisions will either meet the requirements of the BLM Planning Handbook 1601-1, or will help address management concerns and issues identified during public scoping, evaluation of the existing land use plan, and internal BLM management concerns. Other resources not listed below will also be addressed in the RMP.

1. Off-highway Vehicle/Trail Management

Areas will be designated as open, limited, or closed to OHVs.

2. Recreation

The RMP will delineate Recreation Opportunity Spectrum (ROS) classes, and may delineate extensive recreation management areas and special recreation management areas. It will describe (by area) what recreation experiences currently exist and for what recreation experiences the area will be managed in the future. If special recreation management areas are delineated, recreation use objectives would be developed to identify levels of use that will meet the opportunities defined in the ROS inventory. Examples of recreation use objectives include a range of user numbers for commercial vs. noncommercial use and limits on party size.

3. Lands and Realty

The RMP will identify which lands, if any, are available for disposal under the criteria provided in FLPMA (Sections 203 and 206) or other statutes and

regulations. The RMP will identify criteria under which acquisition of land would occur, as well as identify proposed withdrawal areas or those areas where existing withdrawals may be revoked. The RMP will identify where and under what circumstances land use authorizations such as major leases and land use permits may be granted. If appropriate, the RMP may identify right-of-way (transportation) corridors, avoidance areas, and exclusion areas.

4. Access

The RMP will determine what needs exist for acquisition, termination, or relocation of 17(b) and other easements for access to public lands.

5. Wildlife/Fisheries

The RMP will identify habitat management goals and objectives for habitats that support a wide variety of game and non-game species. The RMP will also identify actions and area-wide use restrictions needed to achieve desired habitat conditions.

6. Special Status Species

The RMP will identify strategies, use restrictions, and actions to conserve special status species.

7. Fire Management

The RMP will identify landscape-level fire management goals and objectives.

8. Fluid Minerals (Oil and Gas, Geothermal Resources, and Coal Bed Methane)

The RMP will identify areas open to leasing, subject to the terms and conditions of the standard lease form or to major constraints such as no-surface-occupancy stipulations. Areas closed to leasing will be identified.

9. (d)(1) Withdrawals

The RMP will review existing (d)(1) withdrawals and will recommend either retaining or lifting withdrawals on a case-by-case basis.

10. Solid Minerals

The RMP will identify areas open or closed to the operation of the mining laws, mineral material disposal, and non-energy leasing. In areas designated as open, the RMP will identify any area-wide terms, conditions, or other special considerations needed to protect resource values.

11. Special Designations

Consistent with the goals, standards, and objectives for the planning area, the RMP will:

- Determine if any rivers are suitable for inclusion in the National Wild and Scenic Rivers System,

- Evaluate areas nominated for Area of Critical Environmental Concern designation and, if appropriate, designate them as such,
- Evaluate areas for Research Natural Area and Outstanding Natural Area designation, and
- Determine if any other BLM-administrative designations are desired and, if so, make those designations.

D. Issues Raised During Scoping That Will Not be Addressed

The following topics were raised during public scoping but will not be addressed in this RMP process. Some of these issues are beyond the scope of the plan, while in other cases it has already been determined through BLM policy or planning criteria that the topic will not be addressed.

1. Wilderness Inventory

Current policy, as outlined in a Memorandum from the Secretary of the Interior (April 11, 2003), is that the BLM will address wilderness in new resource management planning efforts only if there is broad support from the State and Federal elected officials representing Alaska. At this time, there is not broad support for wilderness consideration from the State or Federal elected officials representing Alaska. The State of Alaska has requested that the BLM adhere to this policy.

2. Subsistence

The RMP will not change administration of the Federal subsistence program by the Federal Subsistence Board. The RMP will, however, consider impacts to subsistence activities, stipulations to protect subsistence resources, access for subsistence, and management of fish and wildlife habitat to support subsistence species.

3. Wildlife/Fish

The RMP will not affect hunting or fishing regulations or predator control activities. The Alaska Department of Fish and Game (ADF&G) manages fish and wildlife populations on State lands, and the Federal Subsistence Board manages subsistence harvests of fish and wildlife on Federally-administered lands in Alaska. Changes in hunting and fishing regulations are controlled by the Boards of Game and Fish and the Federal Subsistence Board and are beyond the scope of this plan.

4. Wild and Scenic River Designation

The RMP may recommend select rivers or river segments within the Bay planning area for nomination to the National Wild and Scenic Rivers System; however, only Congress may designate rivers to the System.

E. Valid Existing Management to be Carried Forward

Current valid management exists for the Bay planning area in policy, Federal regulations, and in other guidance. The Southwest MFP (1981) is the only existing land use plan for a portion of the Bay area. It addresses only the Goodnews Block part of the Bay planning area. Once approved, the Bay RMP will supersede the management direction for the Goodnews Block in the Southwest MFP.

F. Special Designations, Including Nominations

The RMP will establish Visual Resource Management designations. It may identify special recreation management areas, as appropriate, and will establish recreation management zones. The RMP will make OHV designations, and it may identify trail-related lands for retention, acquisition, withdrawal, avoidance, and exclusion areas. The RMP may designate ACECs and/or identify interpretive measures. The RMP will identify appropriate special oil and gas leasing conditions, terms, constraints, and/or stipulations.

In the Bay planning area, four rivers, the Mulchatna, Chilikadrotna, Tlikakila, and Alagnak, have been included in the National Wild and Scenic Rivers System. Of those, a portion of only one (the Alagnak River) crosses BLM-managed lands.

The Federal government has been directed by Congress to consider potential additions to the National Wild and Scenic Rivers System as part of the land use planning process. The BLM will also identify alternative strategies for the protection of river-dependent values. Through the scoping process, a number of rivers have been recommended for consideration. The RMP will determine the suitability or non-suitability of rivers within the planning area for nomination as potential additions to the National Wild and Scenic Rivers System. Rivers that are found suitable may be forwarded to Congress as recommended for designation.

FLPMA requires that priority be given to the designation and protection of Areas of Critical Environmental Concern (ACECs). ACECs are identified, evaluated, and designated through the BLM's resource management planning process. ACECs are designations that highlight areas where special management attention is needed to protect and prevent irreparable damage to important historic, cultural, and scenic values, fish or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards. The ACEC designation indicates to the public that the BLM recognizes that an area has significant values and has established special management measures to protect those values. These values and resources must be accommodated when future management actions and land use proposals are considered within or near an ACEC.

The RMP may also designate Research Natural Areas (RNAs) and/or Outstanding Natural Areas (ONAs). Additionally, the RMP may utilize a variety of other BLM administrative designations, such as special recreation management areas (SRMAs) and Watchable Wildlife viewing sites.

III. Planning Criteria

The planning criteria were included in the RMP preparation plan. There were no specific comments during scoping on the planning criteria; however, some of the criteria were brought up independently by the public as issues to be addressed by the BLM during planning.

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

Planning criteria are based on the applicable laws and regulations providing agency guidance as well as on consultation and coordination with a wide variety of participating agencies and entities. The criteria are also based on the analysis of pertinent information and the professional judgment of the planning team. Planning criteria may be amended, supplemented, or changed as the need dictates. The planning criteria for the Bay RMP are listed below.

- Opportunities for public participation will be encouraged throughout the RMP process.
- The plan will address all of the lands within the Bay planning area that are managed by the BLM.
- Valid existing rights will be recognized and protected.
- Subsistence uses will be protected and adverse impacts avoided in accordance with Section 810 of ANILCA.
- The BLM will work cooperatively with State and Federal agencies, Native corporations, Tribes, municipal governments, and interested groups and individuals. The BLM will observe Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (2000).
- Wildlife habitat management will be consistent with ADF&G objectives and with FLPMA and ANILCA requirements and mandates.
- RMPs prepared by the BLM will conform to the Bureau's Planning Regulations at 43 CFR 1601-1610, the Bureau's Planning Handbook H-1601-1 (including Appendix C, Program-Specific and Resource-Specific Decision Guidance), and supplemental program guidance for ACECs and fluid minerals.
- The plan will be consistent with the standards and guidance set forth in FLPMA, the National Environmental Policy Act (NEPA), the Council on Environmental Quality's regulations for implementing NEPA, the National Historic Preservation

Act, the Wild and Scenic Rivers Act, and all other applicable Federal laws, regulations, and policies as required.

- The plan will be consistent with the Alaska Land Health Standards.
- Designations for Off-highway Vehicles for all BLM-managed public lands within the planning area will be completed according to the regulations found at 43 CFR 8342.
- Areas of proposed ACEC designation will meet the criteria found at 43 CFR 1610.7-2.
- The review and classification of waterways for eligibility for inclusion in the National Wild and Scenic Rivers System will follow the guidance found at 43 CFR 8351.
- The Economic Profile System developed for the BLM by the Sonoran Institute, or an equivalent, will be used to characterize baseline social and economic conditions.
- The analysis will employ guidance provided in the BLM's Land Use Planning Handbook H-1601-1, Appendix D, Social Science Considerations in Land Use Planning Decisions.
- 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 public lands and using public land resources, and will comply with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations (1994).
- Both the Visual Resource Management (VRM) and Recreation Opportunity Spectrum (ROS) inventories, including text, tables, and maps, will be included as part of the plan.

IV. Data Summary and Data Gaps

A data needs summary was prepared by the BLM at the beginning of the Bay planning process. Data gaps identified through this internal review, as well as data needs identified by the public during scoping, are listed below.

Data gaps identified during scoping:

- Location of (d)(1) lands
- Location of BLM surface lands and subsurface estate
- Contemporary subsistence use areas for the communities within the planning area
- Location of all navigable waters
- Location of all mineral occurrences within the planning area
- Location of trails and 17(b) easements within the planning area
- Wildlife distributions
- Freshwater fish distributions

Relevant data identified as available during scoping:

- Alaska Department of Fish and Game subsistence maps and harvest studies; pending updates
- Togiak National Wildlife Refuge subsistence maps and harvest information
- FWS Office of Subsistence Management subsistence maps and harvest information
- Numerous sources of additional available data identified by the State of Alaska in its April 29, 2004 letter
- A variety of resource studies accomplished by the universities and public schools.

V. Summary of Future Steps in the Planning Process

1. **Analyze the Management Situation.** Preparation of an Analysis of the Management Situation (AMS) is the next step in the process after scoping. The AMS describes the current condition and trend of resources in the planning area, current BLM management of those resources, and opportunities to resolve issues identified during scoping. This analysis provides the baseline reference for the development and evaluation of alternatives. The AMS for the Bay planning area is being developed and should be completed in summer 2005.
2. **Formulate Alternatives.** Alternatives will be formulated by identifying a range of resource objectives and management practices that will address the issues. A no-action alternative will also be included. Alternatives will be developed for the Bay RMP in summer and fall 2005.
3. **Analyze the Effects of the Alternatives.** Once the alternatives are developed, the effects of each alternative on the biological, physical, social, and economic environment will be analyzed. The BLM expects to begin this process in fall 2005.
4. **Issue the Draft RMP/EIS.** This step will begin with the release of the draft RMP/EIS for a 90-day public review period. Public meetings will be scheduled during this time. A notice of availability will be published in the Federal Register in fall 2006. The public comment period will extend for 90 days after publication of the notice of availability.
5. **Issue the Proposed RMP and Final EIS.** Based on the information contained in the draft RMP/EIS and public comment received, the BLM will select a proposed RMP and present it to the public as the Proposed RMP and Final EIS. This step will include public notices of the document's availability, the distribution of the document, and a 30-day protest period on the final document. The BLM will begin this step in fall 2007.
6. **Issue the Record of Decision and Approved RMP.** The BLM expects this step to take place in October 2007.

VI. Opportunities for Public Participation

A website for the Bay RMP was developed to keep the public informed of the planning process. However, this website ([www.anchorage.ak.blm.gov/Bay RMP01.html](http://www.anchorage.ak.blm.gov/Bay_RMP01.html)) and many other BLM websites are currently unavailable due to unscheduled maintenance. It is unknown when the Bay RMP/EIS website will be back on line, but once it is, all planning related documents, including this scoping report, will be available for review.

Inquiries about the Bay RMP/EIS may be made to Patricia McClenahan in any of the following ways:

Telephone	907-267-1484
Fax	907-267-1267 (Attn: Pat)
Email	Questions: patricia_mcclenahan@ak.blm.gov Comment submission: akbayrmp@blm.gov
Mail	Patricia McClenahan The Bay RMP/EIS Project Lead Bureau of Land Management Anchorage Field Office 6881 Abbott Loop Road Anchorage AK 99507

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

VII. Scoping Comments

Resource	Source	Comment
Oil, Gas, and Mineral Development	Aleknagik	We request that BLM lands be left to be designated for subsistence values. Four Nushagak River villages feel that they need some influence on the management of lands adjacent to corporate lands.
Resource Management	Aleknagik	Inventory the values of the big blocks of BLM lands in the Bay Area. Identify values that are the same among them, and those that are different.
Mineral Resources	Aleknagik	The residents of Aleknagik would like to have assistance in determining if there is a source of mercury contamination near the village, either from the naturally occurring minerals in the natural environment or from historic mining activities.
Oil, Gas, and Mineral Development	Aleknagik	Who will protect the subsistence values on behalf of the indigenous people. BLM has that charge as a result of the process of public input and voice.
Oil, Gas, and Mineral Development	Aleknagik	An influx of people with any mineral development will mean additional competition for subsistence resources. How will Dillingham maintain their rural status for subsistence purposes if there is a population explosion? Changing subsistence to “personal use” will hinder subsistence.
OHV Designations	Aleknagik	4-wheeler trails exist between Ekwok, New Stuhayok, and Koliganek that are visible in the summertime. There is a trail from Aleknagik to the second lake area, but it is a winter trail only. A “limited” designation is desirable during some parts of the spring to fall season. Three villages will address OHV use on specific Native selected lands. BLM should follow up, see if BLM plans for adjacent lands are compatible.
Access	Aleknagik	How does the public access these “islands” of Federal lands? It would make more sense to have consolidation of these islands (and conveyance) to the neighboring landowners. Limiting access may be difficult for locals. We can’t afford airplanes, etc.
Access	Aleknagik	Not everybody has a jet boat!

Resource	Source	Comment
Access	Aleknagik	The rich have planes, etc. Keep in mind the usual subsistence user doesn't have all these.
Access	Aleknagik	Clearly lay out BLM's plan for providing access to these remote parcels of BLM lands. (i.e. 17(b) easements)
Access	Aleknagik	Wherever there are large blocks of land, have a defined, marked (by GPS, mapped on) access point. Avoid a plethora of access trails. There are no problems now, but with growth in the region, there will be a problem.
Development	Aleknagik	With a number of lodges in the Aleknagik area, during the summer beginning in June, it is the highest used sports area. With increased traffic, especially the lodges, at the beginning of moose season, there is an impact on the moose. Avoiding development of lodges, on BLM lands will help.
Recreation	Aleknagik	Within the Nushagak River watershed there is more sport hunting than Aleknagik. There is a need to try to limit the numbers within corporate boundaries. If possible, also controlling numbers of hunters on BLM lands will help.
Recreation	Aleknagik	Inventory lodges on state selected lands.
Cultural and Paleontological Resources	Aleknagik	There are more historic sites on the Nushagak that haven't been identified. Preserve as-is. Go back in the records of 14(h)(1) nominations that didn't make it. This is a basis for future archaeological sites inventory.
Cultural Resources	Aleknagik	There has been desecration of grave sites in the cemetery below Mission School. It may have been in conjunction with construction activities.
Fisheries	Aleknagik	Aleknagik residents are fish eaters. Freshwater fish have diminished.
Visual Resources	Aleknagik	We have a scenic landscape. Make sure we don't get any mines!
Fire	Aleknagik	There is a beetle infestation. We are good caretakers. We pick up dry wood. We are not able to gather dry wood on corporation land or BLM land. Please indicate the wood cutting policy for BLM land, as there is a large bark beetle infestation in this area.

Resource	Source	Comment
Fire	Aleknagik	With the spruce bark beetle die-off, there can be a prescribed fire, being careful with succession in the area.
Forestry	Aleknagik	There is a birch leaf miner infestation in the Igulwok River Corridor, between Nerka and Aleknagik.
Wildlife	Aleknagik	The migration routes of the caribou are changing. They are not coming into this area.
Pest Management	Aleknagik	There is a potential for importing pests on muddy fishing boots!
Mineral Development	Aleknagik	The COMINCO Road between the Red Dog Mine and the coast, where ore storage takes place, is one of the most polluted with heavy metals, up to 20 miles out from the road. We have the same concerns with the proposed Pebble mining project. There are several types of potential contamination, including contaminated dust, water pollution, explosions, and potential course of ore transport, which may affect BLM lands in the area and the subsistence resources located on those lands.
Lands	Aleknagik	Lands should not be made available for disposal.
Lands	Aleknagik	We favor State and Federal land exchanges to consolidate BLM lands.
Subsistence	Aleknagik	We want to sustain subsistence values and availability of subsistence for the next 100 years....in perpetuity.
Subsistence	Aleknagik	The Traditional Councils have no land base. Subsistence is a priority for a lot of us. Who is the protector of it?
Recreation	Aleknagik	Inventory how much of BLM lands are adjacent to Native Corporation lands. For OHV use, we prefer to have BLM leave them as-is for subsistence use.
Development	Aleknagik	We prefer to have BLM lands left as they are, without development.
Oil, Gas, and Solid Minerals	Aleknagik	We are concerned about mineral exploration and development close to corporate boundaries. This will be addressed in several joint Resolutions.
Management of BLM Lands	Aleknagik	Aleknagik would like to have local control over adjacent BLM lands.

Resource	Source	Comment
Solid Mineral Development	Anchorage	The mineral potential rate for the BLM lands southwest of Lake Iliamna is fairly low, due to the remoteness and the depth of the glacially deposited materials there.
Access	Anchorage	Regarding further WSR designation for the lower Alagnak River, there should be a transportation corridor on BLM lands with no encumbrance, available from the Lake Iliamna/Dillingham area, for a road or a railway. It would have to cross the Alagnak River via a bridge. The option should be available in the future. For this reason, further WSR designation on the Alagnak River should not take place, as it may preclude such future developments.
Recreation	Anchorage	In the Iliamna-Newhalen area, the use of OHVs (specifically, 4-wheelers), use should be restricted to the established, marked trails. I favor a "limited" OHV designation for BLM lands in this area so as to provide the greatest flexibility.
Recreation	Anchorage	If the Pebble mine is ever developed, planners in the area should be concerned about the influx of people into the area and their activities; for example, OHV trails if free access (an "open" OHV designation) is provided. Developers using OHVs for local transportation will open new trails, which will then be used by local residents. It will tear up the tundra.
Oil, Gas, and Solid Mineral Development	Anchorage	For proposed mining operations off BLM lands, where drainages cross BLM lands, seek to provide BLM input for such projects, including comments on merits of the proposal, potential impacts of the proposal, and whether the risks outweigh the merits.
Oil, Gas, and Solid Mineral Development	Anchorage	Conversely, where the proposal is on BLM lands, BLM will work with the neighboring land managers/owners for compatibility.
(d)(1) Lands	Anchorage	We wish to see the current status of d(1), d(2) lands.
Realty	Anchorage	Check the land status of BLM lands in Lake Clark National Park and Preserve for correctness (re: your generalized land status map).

Resource	Source	Comment
Oil, Gas, and Solid Mineral Development	Anchorage	Explain how compensation will be carried out in the event that a development on State lands is the source of damage on BLM lands.
Section 810 ANILCA	Anchorage	Explain how Section 810 of ANILCA (subsistence) will play in with the Reasonable Foreseeable Development Scenario.
Areas of Special Significance	Anchorage	Identify nationally significant areas on BLM lands in the planning area.
Renewable Resources	Anchorage	It's one thing to protect an endangered species, but the Bay planning area is home to one of the most important salmon fisheries. That fact (economy, quality of life), needs to be looked at very seriously with regard to development.
Oil, Gas, and Solid Mineral Development	Anchorage	Goodnews Bay is heavily mineralized. Discuss the impact of mineral development on the area.
Access	Anchorage Written	Economic research indicates that during the past 20 years, the sport fishing industry in Bristol Bay is attractive to fishermen mostly from the lower 48 seeking a catch and release fishery (i.e., trout) in a remote, uncrowded, pristine area. Development of infrastructure in the region (opening through road development) will change the nature of the fishery and will potentially result in a decrease in dollars coming into the region.
Selected Lands	Anchorage	The State requests that the planning process avoid making decisions that unnecessarily encumber state selected lands. BLM management should be as consistent as possible with State management intent.
Selected Lands	Anchorage	The State requests that the appropriate Native corporation and/or State of Alaska be contacted and their views considered prior to implementing a more specific management program or issuing a permit involving these lands.
Selected Lands	Anchorage	The State requests that BLM carefully review Alaska Department of Natural Resources (DNR) area and management plans addressing BLM lands that are state selected and top filed.

Resource	Source	Comment
Access	Anchorage	The State requests that the BLM consider the issues pertaining to 17(b) easements and trails and RS 2477 trails and section line easements. The State requests that all easements and rights-of-way be identified and recognized in this planning effort.
Navigable Waters	Anchorage	The State requests to work together with BLM on specific water bodies to resolve issues concerning ownership and use of rivers, lakes, and streams within BLM owned lands where management conflicts arise.
ANILCA	Anchorage	BLM is required to develop the plan in accordance with the provisions of ANILCA. Of particular importance to the State are Sections 811, 1110(a), and 1316(a), among others.
Wild and Scenic Rivers	Anchorage	Any additional WSR assessment done for the Bay plan must consider the potential land ownership pattern following completion of the state and native conveyances. The State finds it unlikely that any rivers in the planning area are suitable for WSR designation.
Wilderness	Anchorage	The State requests that BLM adhere to the policy set forth by the Secretary of the Interior regarding wilderness proposals.
Subsistence	Anchorage	At a minimum and when information is available, the State believes that the plan should document and describe subsistence use patterns in local communities located near BLM lands, including subsistence activities by several communities located outside of, but near the planning area that may be affected by planning decisions made for lands within the planning area. When documentation regarding subsistence use area and harvest activity information is incomplete or unavailable for communities known to conduct subsistence activities on BLM lands, the BLM should consider funding research projects to document this information for these communities.

Resource	Source	Comment
Water Rights	Anchorage	Except BLM lands where Congress or the President has withdrawn lands from the public domain for a specific purpose(s), BLM lands are considered part of the public domain and are not subject to the Federal Reserve Water Right.
Access	Anchorage	The State requests that BLM consider State transportation planning policies and documents relevant to the Bay RMP planning area.
Access	Anchorage	The State requests that BLM consider the necessity of providing for the development of utility corridors, including corridors for the transport of oil and gas, as well as transportation corridors to support future economic growth in the Bay Area.
Coastal Zone Management	Anchorage	The State requests that BLM consider approved Coastal Management plans and policies when developing recommendations for BLM lands within a Coastal Zone area.
Subsurface Mineral Estate	Anchorage	The State requests that BLM consult with the State DNR before taking any actions that could potentially negatively impact resource development on State or State-selected lands.
Oil and Gas Leasing	Anchorage	The State requests the opportunity to specifically review and comment on any proposed actions that may limit or discourage exploration and development in the Bay area.
Solid Minerals	Anchorage	The State requests that access for transportation and utility infrastructure to mineralized areas be given serious consideration. Planning for BLM lands located near or adjacent to these mineralized areas should take into consideration the need for flexibility in planning for access and supporting infrastructure based on land ownership and physical characteristics of the terrain.
Access	Anchorage	The State requests that BLM consider the potential need for the establishment of mineral exploration camps and cross-country winter travel of equipment on lands within the planning area.

Resource	Source	Comment
Mining	Anchorage	<p>The state has identified significant mineral deposits and mineral districts within or adjacent to the Bay planning area:</p> <ul style="list-style-type: none"> Goodnews Bay Platinum District Pebble Gold-Copper Kasana creek Sleitat Mountain Kemuk Mountain Johnson river Shotgun Fog Lake BHP Minerals Iliamna Project
Leasable Minerals (Coal)	Anchorage	<p>Should coal operations be developed on Federal lands in this area, the State and the DOI will most likely enter into a cooperative agreement to grant the State the authority to implement the Surface Mining Control and Reclamation Act of 1977 on Federal lands.</p>
Recreation	Anchorage	<p>The State's primary recreational interest in BLM lands is continued recreational access, both motorized and non-motorized. The state is also interested in management of these lands so that land and resources are accessed responsibly by the public and responsibly used. The State requests that the BLM consider management strategies that facilitate proper waste disposal by recreational users including hunters and boaters.</p>
Off-highway Vehicles	Anchorage	<p>The public lands of the study area receive intensive off road vehicle use. Access to most of the planning area of the region is by off highway vehicles through an extensive trail system. The State is very concerned about protecting continued access to state-owned land and water. However, BLM should also consider management options that protect Federal land from significant impacts from OHV use in sensitive areas. BLM should work with ADF&G and DNR to determine traditional routes of access and protect sensitive areas. Existing State regulations may be more restrictive for certain areas than current BLM regulations, as well.</p>

Resource	Source	Comment
Special Uses	Anchorage	DNR requests that BLM consult with the state prior to developing policies regarding helicopter use, OHV use, and/or commercial recreation use on State selected lands in the Bay planning area.
Forestry	Anchorage	The State requests that fire management planning decisions for BLM lands be made through the existing process detailed in the Alaska Interagency Wild land Fire Management Plan, and that all fire management requests for active fires on BLM lands be made through the existing process. The State particularly needs an updated fire plan to address the significant impacts of the spruce bark beetle infestation along the eastern shore of Lake Iliamna, including the area around Kokhanok. Updated vegetation mapping for the purposes of identifying fire fuels would be beneficial in this planning exercise.
Cultural Resources	Anchorage	When any Federal undertaking including any action funded or authorized by the Federal government with the potential to directly or indirectly affect any archaeological or historic site is planned, a consultation with the State Historic Preservation Officer under Section 106 of the National Historic Preservation Act must be initiated. If archaeological or historic sites are identified in the project area their significance should be evaluated to determine their eligibility for inclusion in the National Register of Historic Places. The State requests that the State Historic Preservation Office be notified if archaeological or historic sites are identified through this planning process. The State may request that recreational or commercial uses be precluded in order to protect archaeological and historic sites.
Withdrawals	Anchorage	The State asks that all Federal withdrawals be identified and mapped, and the purpose for each withdrawal be noted.

Resource	Source	Comment
Land Exchanges	Anchorage	The State feels that land exchanges generally have a low success rate and require significant financial and staff resources to implement. At this time exchanges are not likely to be a high priority for the State.
Withdrawals	Anchorage	Bristol Bay Native Corporation is interested in seeing (d)(1) withdrawals within BBNC's region lifted.
Oil, Gas, Mining, and Logging	Anchorage Written	I favor reasonable and well-planned mining, oil production and logging activities. There are numerous examples in our state of how things are being done right. Please do not lock off any more lands, but continue to insist that any production follows rational rules.
Management of BLM Land	Anchorage	The use of the Alagnak River and Parks, and uses of adjacent lands should be compatible. Analyze how proposed management strategies will affect NPS lands. For example, how will decisions affecting water quality affect the fish? Other topics, visual resources, development of trails for access to Park lands, air quality.
Fire	Anchorage	Describe how the fire management plan will be incorporated into the planning process.
Government to Government Consultations	Anchorage	Describe how Government-to-Government consultations are being carried out for this plan. Describe your communication plan (with the public) for the process, scheduled in terms of the communities' needs and schedule. Describe how input will be received back from the communities.
Resource Management	Anchorage	Village concerns in the Calista region include sports fishing, large fishing lodge operations, and the smaller river systems in the Goodnews Block.
Recreation - Guides and Outfitters	Dillingham	Too many people are hunting in the Koliganek area. We reported observing herding wildlife with airplanes. Use special recreation permits to ease the situation.
Oil, Gas, Solid Mineral Development	Dillingham	The areas adjacent to Koliganek and New Stuyahok are not feasible for mining. The land should stay as it is. Also, between Igiugig and Ekwok there is some interest in mining. The area is pretty close to the Nushagak River for such activities.

Resource	Source	Comment
Oil, Gas, Solid Mineral Development	Dillingham	No more mining activities on BLM lands. These are small parcels, and should be managed like the surrounding lands. No lodges. Use for subsistence, recreation. Use an ecosystem approach. You can't just manage postage stamps.
Off-highway Vehicles	Dillingham	Have as little change as possible regarding current restrictions on OHVs.
Off-highway Vehicles	Dillingham	There are no lines telling people, "this is BLM land."
General Scoping	Dillingham	The few people attending scoping meetings represent a great many people.
Off-highway Vehicles	Dillingham	In summer and spring when it's wet, protection for vegetation, berries, etc., is also important.
Subsistence	Dillingham	I suggest these lands retain the subsistence priority.
Subsistence	Dillingham	It would be good to maintain a balance between development and other uses, especially subsistence.
Oil and Gas Development	Dillingham	Consider approaches such as well spacing to avoid impacts of oil and gas development.
Oil and Gas Development	Dillingham	Our first priority is subsistence use of wildlife and commercial uses of wildlife.
Realty	Dillingham	With fragments of land, how disruptive will disposal of BLM lands be to the management or ownership of other lands. Proceed extremely cautiously.
Realty	Dillingham	When BLM dealt with Native allottee applicants, a lot of restrictions were placed on us. If there are any disposals, consider the same restrictions apply, in fairness to everyone! It took years and years of dealing with agencies (and concessions) to get title.
Water	Dillingham	Address water rights. Development or disposal may affect downstream conditions.
Water	Dillingham	The quality and quantity of water has supported the huge abundance of fish and wildlife. BLM must protect water quality.
Multiple Use	Dillingham	Consider future activities: oil and gas, mining, timber cutting, and consequent production of human waste.
Water	Dillingham	Coliform from humans and wildlife is a problem.

Resource	Source	Comment
17(b) Easements	Dillingham	Be sure 17(b) easements and RS2477 have the same center line where they mapped out the existing trails. The project needs to be completed. The Corporation would like to work collaboratively.
Access	Dillingham	Locate where the existing 17(b) easements and the existing RS2477s are through BLM lands.
Access	Dillingham	In the Nushagak drainage, there is excellent cooperation between the State and local landowners. Elsewhere, there may be more controversy. Opportunities for cooperation are different in different parts of the area.
Access	Dillingham	It is critical to ensure that problems are worked out so as to allow for public access to BLM lands. Fog Lake.
Access	Dillingham	Be wary of former villages, burial plots. Go to the villages, identify them.
Realty	Dillingham	We request maps showing surface, subsurface estate and d(1) withdrawals.
Access	Dillingham	Describe if/how a winter trail will affect a Native allotment (easement).
Oil, Gas, Solid Mineral Development	Dillingham	Federal protections for subsistence exist. We believe mining will be a major impact, and will affect this major fishing area (Bristol Bay). See the previous comments on subsistence, and maintain restrictions.
Subsistence	Dillingham	There is more and more competition from other user groups; not just local people. The picture is complex because there are many land owners. Our traditional activities generally take place on the rivers and lake sides. However, others are using a variety of modes of travel, giving access to many different areas. Concern: the guiding industry has no cap or control. We are looking for potential state legislation or other type of regulation.
Subsistence	Dillingham	The previous comments on subsistence were good ones. With modern technology, subsistence hunters can be outfished, out hunted. In allocation of resources, take technology into consideration (i.e., travel modes, GPS, etc.).

Resource	Source	Comment
Subsistence	Dillingham	At the same time, locally people sometimes use technology. Keep a balance.
Planning and Resource Management	Dillingham	Get management information to the players so we are managing the resources.
Wildlife	Dillingham	We need to discuss enhancement of the moose and caribou populations, making sure there is no overgrowth of a species population.
Wildlife	Dillingham	I reiterate, keep track of wildlife populations. Sometimes we have to go hundreds of miles to hunt.
Fire	Dillingham	The plan should address fire, fire suppression zones, and fire management, including provisions for letting it burn and protecting, propagating wildlife habitat.
Cultural and Paleontological Resources	Dillingham	Identify, inventory and catalog cultural and paleontological sites.
Cultural and Paleontological Resources	Dillingham	Protect information about cultural and paleontological sites.
Conservation Management	Dillingham	Each village has its own conservation rules. Access areas should be protected.
Subsistence	Dillingham	Incorporate new knowledge about subsistence practices to existing (TEK) knowledge. When the land changes, the uses change. Incorporate this into the planning process and the document.
Water	Dillingham	Especially in Bristol Bay, water is the heart of it. Salmon, our subsistence resources depend on water. Humans may even be endangered by water. For example, well drilling in Dillingham, and proposed mine development at the headwaters of Bristol Bay's major drainages. Until now we're worried about development. We as people of Bristol Bay need to be on top of development should it get going.
Water	Dillingham	Rivers and lakes of importance include the Tikchiks and other lakes, Wood River lakes, Snake, Igushik. Silvers and kings are our ace in the hole. There are normal fish ups and downs; we're very fortunate.
Oil	Dillingham	Today we're more dependent on oil.
Water	Dillingham	Address BLM management of water quality.

Resource	Source	Comment
Fisheries	Dillingham	Take into consideration fresh water fish species as well.
Resource Management	Dillingham	Prioritize renewable land resources over non-renewable in our management considerations.
Hydrological Units	Dillingham	All of the watersheds are important, perhaps for different species.
Vegetation	Dillingham	We have edible and medicinal plants.
Forestry	Dillingham	Consider for timber harvesting, location of saleable timber, access, impacts to siltation, water quality, and erosion.
Vegetation	Dillingham	Use of vegetation for commercial pharmaceutical purposes needs to be monitored carefully.
Forestry	Dillingham	From Black Point to Ekwok, noted beetles. Need to monitor carefully.
Solid Mineral Development	Dillingham	Consider the potential impacts of introduction of ammonium nitrates (a fertilizer) as dust and/or as waterborne particles into the natural environment.
Air	Dillingham	Include air quality in the scenario. Describe the prevailing winds in the area of proposed mineral development.
Air	Dillingham	The prevailing winds, and dust, blow west in the summer, from Iliamna toward the Kaktuli, and reverses in winter.
Resource Management	Dillingham	Co-management
Water	Dillingham	New Stuyahok has been carrying out water monitoring all the way to Aleknagik, including underwater cameras, monitoring technology, fish counting. This needs to continue.
Resource Planning and Management	Dillingham	Involve the people at the grass roots level, including the schools, for training, and putting people in the field.
Air	Dillingham	Prior volcanic activity provides an example of how dust from potential mining operations might be deposited.
Air	Dillingham	There are other threats to air quality besides diesel.
Water	Dillingham	The Nushagak-Mulchatna Watershed Council has developed plans, baselines for water quality.
Administrative Boundaries	Dillingham	With regard to administrative boundaries, all the land is the same.
Subsistence	Dillingham	Caribou distribution has changed. This area's subsistence maps need updating!

Resource	Source	Comment
Wildlife	Dillingham	Movements of Mulchatna caribou herds are being re-routed by supercubs. Small planes keep them on State lands. This and wanton waste are hurting our herds.
Community Resources	Dillingham	Dillingham High School's species collection data have been used by scientists to affect resources. Make sure these scientific resources are utilized to make this a living document.
Community Resources	Dillingham	One such study, for Ekwok, studies water levels, ice, salmon and smolt migration. Investigate to see if there are other such projects.
Community Outreach	Dillingham	BLM managers, be available to give seminars over the next 2-3 years to bring local entities up to speed on land management issues.
Community Outreach	Dillingham	Help pass land management capacity on to the users of the land.
Watersheds	Dillingham	Use the Nushagak-Mulchatna Watershed Council Report in your planning process. Note the prioritization of locations along the watershed for resource protection.
Recreation	Dillingham	With respect to guides and outfitters, in the area around Koliganek, there are too many operating in their area. People have observed herding of wildlife with airplanes. BLM needs to take action for BLM lands.
Recreation	Dillingham	Choggiung Corp. doesn't want OHV use on its land, which are steep, wet, and unsuitable for OHV use. Land use on adjacent BLM lands should be compatible.
Solid Minerals	Dillingham	The region around Koliganek and New Stuyahok is not feasible for a mine, based on the subsistence needs of the residents. The area should stay as it is. No more mining activities on BLM lands in the Bay area. These are small parcels. Manage them like the surrounding lands. Do not develop lodges on BLM lands. Use them for subsistence, recreation.
Wildlife	Dillingham	Tonight, we have only touched upon a very small percentage of species that may be affected by development, and if affected will affect us.

Resource	Source	Comment
Planning	Dillingham	Togiak National Wildlife Refuge has a large land base with designated wilderness that is managed accordingly. Take into consideration the management practices of lands adjoining BLM lands.
Solid Mineral Development	Dillingham	Togiak NWR is concerned about the cumulative effects of platinum mining. BLM should discuss impacts to BLM land, and describe mining permits, agreements, etc. in this area.
Realty	Dillingham	Discuss whether or not BLM has a land acquisition program.
Recreation	Dillingham	Guide camps. Discuss BLM permitting procedures and program.
Management of BLM Lands	Dillingham	Take into consideration the management practices of adjoining land managers.
Oil, Gas, and Solid Mineral Development	Dillingham	There is increased mineral development in the Goodnews Block. Study cumulative effects and impacts to BLM lands.
Recreation	Dillingham	Guide camp permitting in the Bay area.
Solid Minerals Development	Written Fairbanks	I am a second generation commercial fisherman in the Bay area. This land is important to me and to my family. We don't want to see it developed. Mining will ruin the land, and the way of life we follow...to provide private profit....
Solid Mineral Development	Written Girdwood	Keep the existing protections against mineral entry. I understand the significance of groundwater and river contamination because I live down stream from a mining area and to avoid a build-up of heavy elements and toxic byproducts I must collect my drinking water from a pure source 10 miles away.
Recreation	Homer	Keep recreational activities dispersed. They are getting congested. The Kenai Peninsula and the Alaska Peninsula are the two remaining magnificent areas in the U.S.
Recreation	Homer	Permitting is one method of dealing with the issue of congestion.
Oil, Gas, and Solid Mineral Extraction	Homer	Any proposed oil, gas, or solid mineral activities should be required to post sufficient funds to cover remediation and restoration.

Resource	Source	Comment
Oil, Gas, Solid Mineral Extraction	Homer	The mining activity must pay for itself without public funds, pay taxes, and not be environmentally destructive. It must not pollute the water. It must be good for (serve) all Alaskans.
Special Area Designations	Homer	Make designations specific to specific areas as needed. For example, if the area around Kokhanok has a problem with bear poaching, designating a special bear management area might be in order.
Resources	Homer	Continue gathering baseline data on renewable resources for planning purposes.
(d)(1) Designated BLM Lands	Homer	(d)(1) lands that are currently closed to mineral entry should remain closed until further study has taken place.
Planning Decisions	Homer	Be sure not to make short-sighted decisions. Plan for the future.
Recreation	Homer	It is prudent to continue recreational use as a balanced process that includes wildlife, habitat, and humans. Do not be short-sighted. Don't damage other resources. Do no harm.
Access/Infrastructure	Homer	I have great fears and concerns about development. Look at the history of development in Alaska.
Special Area Designations	Homer	Special areas need to be protected.
Archaeological Sites	Homer	Archaeological sites must be protected.
Subsistence	Homer	Subsistence must be protected.
Subsistence	Homer	Take cues from the communities in the planning area regarding subsistence and the resources on which they depend. Especially pollution.
Recreation	Homer	Disposal of human waste/sewage of visitors is a source of pollution. Implement requirements, a permit with stipulations to carry human waste out.
Solid Mineral Development	Homer	Protect watersheds from mining activities, which can bring centuries-long impacts on health. You can't remove contaminants such as heavy metals and chemical pollutants caused by mining activities from water.
Solid Mineral Development	Homer	Water is more precious than gold. Protect all of the drainages in Bristol Bay. Protect water, fisheries, animals, people.

Resource	Source	Comment
Soils	Homer	Pay attention to erosional issues, for example, as they may affect archaeological sites.
Forestry	Homer	Be very careful how beetle-killed forests are managed. Manage cleanup of slash; encourage more natural reforestation.
Forestry Infrastructure	Homer	Be careful about building roads to salvage timber; this activity can potentially cause an erosional problem.
Mining Infrastructure	Homer	Be careful about building roads for mining activities, which also can potentially cause an erosional problem.
Infrastructure Development	Homer	Be careful about infrastructure development.
Energy Development	Homer	Investigate clean alternative sources of energy, i.e., wind power, tidal power, solar power, power conservation.
Off-highway Vehicles	Homer	Exercise caution with OHVs. Allow villages to have reasonable local transportation systems, planned so as not to impact the ecosystem.
Infrastructure development	Homer	Roads open areas to an influx of people.
Off-highway Vehicles	Homer	Provide a OHV (ATV) "limited" designation. Have certain designated routes to diminish environmental/habitat damage.
Access	Homer	Landing strips need to be looked at. Informal strips need to be inventoried and regulated, with an eye to impacts.
Habitat Special Areas	Homer	The Bristol Bay priority species are salmon and other anadromous fish. Water quality is essential for sensitive species like rainbow trout.
Habitat Special Areas	Homer	The Goodnews Bay area has several special species of birds. We want to protect their populations.
Oil, Gas, and Solid Mineral Extraction	Homer	Mining runoff, oil and gas pollution contaminates crustaceans, invertebrates.
Ecosystem Management	Homer	Allow nature to take its course, with respect to predator control.
Ecosystem Management	Homer	Use the guiding principle of maintaining the natural ecological balance by not interfering.
Visual Resource Management	Homer	Leave the landscape natural. Minimize the number of mining pits.
Wilderness Values	Homer	Protect all wilderness values until such time that they can be properly inventoried and studied for potential designation.

Resource	Source	Comment
Solid Mineral Development	Homer	The Kuktuli River is especially important. It has been suggested as a tailings impound area for the proposed Pebble Mine. This threatens the Nushagak and Mulchatna Rivers. It threatens these primary, world-class, salmon spawning rivers.
Solid Mineral Development	Homer	(d)(1) lands should stay closed to oil, gas, and solid mineral development. The potential impacts outweigh the benefits.
Oil and Gas Development	Homer	Identify reasonable foreseeable development alternatives (including transportation) for oil and gas.
Wild and Scenic Rivers	Homer	Identify wild and scenic rivers
Habitat	Homer	Focus on identifying critical wetland and water habitat areas.
Access	Igiugig	When there's not enough snow, we use the lake shore north to access winter hunting areas west of Iliamna.
Lands	Iliamna	We request that BLM sign its lands. Nobody knows whose lands they're on. There is confusion about the location of BLM lands.
Commercial Outfitting	Iliamna	The plan should address how many game animals are taken and how much money is generated by outside guides, transporters, and others.
Fishery	Iliamna	Protect spawning salmon. Salmon need healthy spawning habitat.
Forestry	Iliamna	There is a spruce bark beetle infestation in the lake area.
Forestry	Iliamna	Iliamna Natives Ltd. requests assistance in contacting agencies who can assist with salvaging timber.
Subsistence	Iliamna	The rivers, streams, and lakes in the Iliamna region are important salmon spawning areas.
Subsistence	Iliamna	Salmon in the red stage are still a subsistence food resource and should be treated that way by sports fishermen.
Subsistence	Iliamna	Catch and release fish should also be treated as a subsistence food. Educate people to get the fish going again when released. Do not discard them.
Subsistence	Iliamna	The US Air Force is sending low flying aircraft in the New Stuyahok area, between Lime Village and Koliganek.

Resource	Source	Comment
Recreation	Iliamna	Super cubs have been observed landing and hunting caribou and moose on BLM lands and other lands. The survey of who is using BLM lands should be a lot tighter.
Planning	Iliamna	A good example of a potential conflict is classifications (e.g., wilderness, OHV designations) for adjoining State and Federal lands. Use consistent classifications or designations.
Solid Mineral Development	Iliamna	BLM, protect Kaskanak Creek from the impacts of mining.
Solid Mineral Development	Iliamna	Mining is not compatible with the natural resources of all of the Bristol Bay drainages, especially salmon.
Wild and Scenic Rivers	Iliamna	Make river management more restrictive or protect from future disturbance.
Off-highway Vehicles	Iliamna	Make OHV designations more restrictive; protect the land from future disturbance.
Off-highway Vehicles	Iliamna	Kaskanak Creek –jet boats are being used near Igiugig; we need motor restrictions.
Subsistence	Iliamna	Harvests are not reported to protect key use areas.
Archaeology/Paleontology	Iliamna	Animal migration trails, historic human trails shouldn't be disrupted by disturbance. Many trails and sites that are good for camping, crossing, today were also used hundreds of years ago.
Subsistence	Iliamna	Within 50 miles of Iliamna there is subsistence. This includes Kaskanak to the head of Gibraltar Lake to Cook Inlet, and between Lake Iliamna and the Park. Includes BLM lands.
Subsistence	Iliamna	Levelock. Jet boats use Kaskanak Creek, and the Branch River, but should not be allowed. There is soil erosion of the riverbank from boat wake, and there are competition issues. We don't want jet boats on the Tizimina.
Subsistence	Iliamna	Protect caribou by prohibiting camps on caribou travel ways.
Archaeology	Iliamna	Provide management for keeping cultural sites on BLM lands off limits to the public.
Hydrology	Iliamna	There is erosion along the Branch River, especially on land owned by Levelock Natives.

Resource	Source	Comment
Mining	Iliamna	There is concern that if mining proposals go forward, toxic dust will blow onto BLM lands and impact the caribou that graze there.
Mining	Iliamna	We want protective measures should mining proposals go forward.
Access	Iliamna	Access (a 17(b) easement?) is needed for access to Roadhouse Mountain.
Access	Iliamna	A 17(b) easement in Eagle Bay provides access to State and Federal lands. Also Chekok Bay. These are on 1952 USGS maps. What about trading historic easements for others for public use?
Recreation	Iliamna	Keep guides from hunting on BLM lands.
Recreation	Iliamna	Sport hunting is done during the moose and caribou rut, at a time they should not be hunting. Hunters are taking the seed animals.
Access	Iliamna	Jet boats on the Branch river are creating problems with wash, erosion of the bank.
Access	Iliamna	The Native Corporation has a trail marked RS2477 that they want to preserve in its present state as an historic trail.
Subsistence	Iliamna	We are seeing a decline in caribou, moose, and salmon.
Classification of Lands	Iliamna (several participants provided similar comments.)	There should be consistent classifications for adjoining State and Federal lands. A potential conflict is Kaskanak Creek. It should be designated critical fish habitat, and should be a critical habitat area for moose, beaver, migratory birds, and salmon. Places where salmon and trout spawn shouldn't be open to mining.
Solid Mineral Development	Iliamna	How can allotment owners be protected from mining impacts should the proposed mines go forward?
Solid Mineral Development	Iliamna Written	Do not open BLM lands in this area to mining, which has the potential to immediately affect the Iliamna region's Native culture by negatively impacting the natural and biologically important area of the Bristol Bay watershed.

Resource	Source	Comment
Oil, Gas, and Mineral Development	King Salmon	In the event of oil, gas, and mineral development in Bristol Bay on BLM lands, we need to insure that some of the profits are set aside separately in a special fund for pollution remediation and for reforestation of the affected area in addition to other BLM requirements. We want to insure that the area will be cleaned up to the best of their ability once they are done.
Oil, Gas, and Mineral Development	King Salmon	King Salmon Tribe supports all oil, gas, and solid mineral development.
Access	King Salmon	King Salmon Tribe supports ground transportation infrastructure development: road, railroad from King Salmon to Anchorage or the Interior Railbelt.
Subsistence	King Salmon	All of the area's people support the Federal subsistence system, and the status quo on Federal BLM land (because of a potential Katie John overturn). However, we want more Federal subsistence hunting and fishing land to be made available, including BLM land.
Oil, Gas, and Solid Mineral Development	King Salmon	King Salmon Village is in support of oil and gas exploration and mining exploration and development as long as it's done in a safe and responsible manner.
Access	King Salmon	King Salmon Village is in favor of developing ground transportation to Anchorage to make access easier for development.
Wildlife Habitat	King Salmon	BLM lands adjacent to the Alagnak River are Mulchatna caribou wintering range. The area has been hammered.
Wilderness Values	King Salmon	The Kvichak to the Nushagak rivers region has wilderness values.
Special Management Areas	King Salmon	Look at the Goodnews coastal areas for special management of bird habitat.
Access	King Salmon	Igiugig lands, access to the outlet of Kukaklek Lake will meet with resistance. Purpose not clear, but possible lodge.
BLM Management	King Salmon	There is a confusion of authorities on the Alagnak River. Explain what lands this plan will cover, and how it will be implemented. Include OHV designations.
Special Management Areas	King Salmon	Are special designations viable? How will they be managed, enforced?

Resource	Source	Comment
Recreation	King Salmon	Outfitters. There is competition on the Alagnak River, guided vs. unguided.
Planning	King Salmon	Explain in the RMP how the plan will be implemented.
Planning	King Salmon	The Lake and Peninsula Borough requests that you make a presentation to the Lake and Peninsula Borough Assembly or Planning Commission prior to continuing with this plan.
Soils	King Salmon	There is a concern for coastal erosion beyond State jurisdiction.
Special Management Areas	King Salmon	Suggest areas for special designation: Kokhanok Lake, BLM lands adjacent to the Alagnak River, Mulchatna caribou wintering range (area has been hammered). Kvichak to Nushagak region has wilderness values. Tundra swans.
Oil, Gas, and Solid Mineral Development	Koliganek	We are concerned about mineral development on BLM lands adjacent to the villages in this region. We must consider the renewable resource value and subsistence. If you don't have the land and its resources, you have nothing. We must have a balance.
Oil, Gas, and Mineral Development	Koliganek	We are concerned about the potential for mining development in the Koliganek/Nushagak River area. People have said "no" to such development because of the potential negative impacts on the land and natural resources, subsistence resources and values.
Oil, Gas, and Mineral Development	Koliganek	I am not particularly interested in seeing the development of the type of activity that is occurring in the Lake Iliamna area. The impacts are not good. There is a possibility that there may be mining activity in the Shotgun Hills.
Oil, Gas, and Mineral Development	Koliganek	A slight change in the pH of the water will have a big impact on the fish. The negatives of big development will outweigh any positives and not leave much for our children in the future.
Recreation - Commercial Use	Koliganek	Commercial use, i.e., moose hunting, is badly on the decline. I would like to see a program similar to the one in Aniak (in partnership with the state). There are too many commercial outfitters!

Resource	Source	Comment
Wildlife	Koliganek	We are concerned with the number of wolves seen near the village, and seen taking calves. Also the number of bears. This, with increasing guide and hunter pressure, and poor calf survival, has decreased hunting success. Villagers are not getting enough subsistence caribou and moose for their families. BLM should enforce the land and shoot rule.
Watershed Management	Koliganek	BLM is invited to participate in the Watershed Council.
Solid Mineral Development	Koliganek	In addition to the environmental effects of mining, there will be social effects. There is no plan for this.
Access	Koliganek	There are no airplane hunting restrictions for GMUs 17(B) and 17(C). Bull caribou are being decimated by air hunting. This is probably taking place on BLM lands. Caribou are being herded, turned back in the passes, by airplanes. Many have witnessed this. Moose spotting is also taking place. Explain in the RMP how BLM will police the regulations.
Solid Mineral Development	Koliganek	Strip mining isn't good for the waterways and fisheries.
Water	Koliganek	Ground water will be used for solid mineral development (i.e., Pebble). All of the aquifers are tied together. One cup of MTBE spilled on the ground will pollute 100,000 gallons of water. The plan should study the potential for the region for: subsequent lowering of the water table, potential for pollution of the ground water with toxic substances; potential for formaldehyde contamination of the groundwater from explosives used in mining.
Subsistence	Koliganek	Koliganek residents live a subsistence lifestyle. We winter in Koliganek, and commercial fish in the summer.
Subsistence	Koliganek	Elders are having a difficult time. The Elderly check was cut off, so there is less money. At the same time, energy bills are high, two or three times higher than in urban areas. Elders depend on subsistence resources. Donations come from subsistence hunters.

Resource	Source	Comment
Subsistence	Koliganek	Wanton waste is a problem. Meat brought here from the guides is rotten and dirty. Some only bring the horns back. In subsistence, all of the animal is utilized except the hide and the backbone. The major problem occurs in the Mulchatna-Nushagak Hills, from Harris Creek north.
Forestry	Koliganek	There was prior interest in developing an industry based on timber. However, the sparse stands of black spruce are not good for anything except commercial pulp, and this is a remote area. Commercial interests decided it was not financially viable.
Fire	Koliganek	The Nushagak River has been very low, with effects on fishing. Due to the dryness of the environment, there is an increased fire hazard, and a lot more fires in this area. Be clear about the fire management plan for BLM lands around villages in this planning area.
Wildlife	Koliganek	There is a caribou migration route through here in the fall. In recent years, the caribou have been taking a different route.

Resource	Source	Comment
Solid Mineral Development	Koliganek, New Stuyahok, Ekwok, and Nondalton Written	Joint Resolution of New Koliganek Village Council and Koliganek Natives Limited #2005-1. Joint Resolution of City of New Stuyahok, New Stuyahok Traditional Council, and Stuyahok Limited #2004-01. Joint Resolution of City of Ekwok, Ekwok Village Council, Ekwok Natives Limited #2004-03. Joint Resolution of Nondalton Tribal Council and City of Nondalton #2-22-05. The parties of the Memorandum of Understanding strongly oppose the development of a mining district in the area of the Mulchatna, Kuktuli, Upper and Lower Telarik Creek, Chulitna, Newhalen, Nushagak rivers, Lake Clark, Six Mile Lake and Iliamna Lake, Kvichak River and Kvichak Bay, and Nikobuna River, and request the governor of the State of Alaska and its administration to halt all plans to develop the mining district area. The parties to the Memorandum of Understanding request that Senator Ted Stevens, Senator Lisa Murkowski, and Congressman Don Young oppose the development of the mine, and ...respectfully request the Lake and Peninsula Borough to reconsider and withdraw their support.
Solid Mineral Development	Koliganek Written	Open pit mining in Alaska is not a smart idea. Mining is not a renewable resource and will last only for 30-60 years. Equipment used by mining companies today, do a lot of damage to the land, air, and wildlife.
Solid Mineral Development	Koliganek Written	The operation of open pit mining activities will negatively impact our vast and untouched wilderness, the land, fish (salmon and fresh water fish) and wildlife (moose and caribou) are all renewable resources that can all be easily lost and take hundreds of years to restore.
Solid Mineral Development	Koliganek Written	[Mining] development may sound like a good idea for the local and state economy right now, but in the long run will do more harm to the environment than good to the economy.

Resource	Source	Comment
Solid Mineral Development	Koliganek Written	Mining laws of 50 years ago ... need to be updated to take into consideration the environmental impacts that we now know result from open pit mining. I think they need to be looked at by our state legislature, regional corporations, village corporations, rural communities, private organizations, etc., in order to ensure that all concerns are adequately addressed. Think of our children's future, and the future of our native culture and traditions, in order to ensure the safest and most responsible use of our lands.
Subsistence	Levelock	Levelock uses the Branch River; behind Sugarloaf.
OHV Designations	Naknek	Leave the OHV designation open. Subsistence users need to go anywhere they need to. Open as much as possible.
OHV Designations	Naknek	I recommend a "limited" OHV, based on surveys and knowledge of prior use. With reference to the Kokhanok report, it is incorrect. There has been historic use, but not necessarily wheeled use.
OHV Designations	Naknek	NPS has not used 3 or 4 wheelers on the ice; it should be allowed where boats and motors have been allowed.
Realty	Naknek	Pike Ridge: BLM land is adjacent. Need GOOD land ownership maps. Make an unrelated (to the RMP) set of maps available for public use.
Access	Naknek	Imaginary boundaries of NPS, BLM, etc., and restriction on crossing, preclude development of access routes.
Oil and Gas Development	Naknek	Lift restrictions on oil and gas exploration and development on BLM lands. Make them available for leasing, bidding.
Subsistence	Naknek	High priority subsistence areas should be identified and protected.
Subsistence	Naknek	Subsistence priority, cultural and traditional use, should be given priority before oil and gas, hydrocarbon mineral exploration and development.
Commercial Fishery	Naknek	There is a current proposal for a commercial salmon harvest (140 setnet sites) on the Alagnak River.

Resource	Source	Comment
Natural Resources	Naknek	For natural resources, State information is a good resource.
Subsistence	Naknek	Don't mess with the berry patches!
Oil, Gas, and Solid Mineral Development	Naknek	Seismic testing should just be done in the winter, and with clear guidelines.
Oil, Gas, and Solid Mineral development	Naknek	If development were to take place on BLM lands, and if BLM were to get a royalty, we would like to see a percentage put into local community development. If gas is located on BLM lands, the community should get to use that gas free, like Nuiqsut. Also, payment for a gas pipeline. See Stevens royalty press release re: local development.
Access	Naknek	Construction of a bridge from Naknek to South Naknek would support oil, gas, and solid mineral development.
Oil, Gas, and Solid Mineral Development	Naknek	We wish to have the ability to keep some restrictions in place on oil, gas, and mineral development.
Access	Naknek	A prior proposal for a road, as a better alternative, is from Williamsport or Nerka Bay. We have a better chance to get such a road.
Access	Naknek	Address the process BLM has to obtain access to use of BLM lands, for a variety of uses.
Access	Naknek	BLM, post your land better! On boundaries between owners, for example, King Salmon Creek.
Solid Mineral Development	Naknek	Potential impacts of mining tailings to all fish and wildlife species native to this area and used by subsistence users may last sixty or more years.
Visual Resources	Naknek	If we have oil and gas drilling, we should have directional drilling, with the simplest tower. The same with mining---with the winds, blowing dust and sand can be seen for 30-40 miles.
Solid Mineral Development	Naknek	We need detailed mining plans.
Oil, Gas, and Solid Minerals	Naknek	Ensure remediation for oil, gas, solid mineral activities. That means restoring the environment to a natural state. (Place overburden back in the pit to make the landscape look natural again.)

Resource	Source	Comment
Oil, Gas, and Solid Mineral Development	Naknek	Provide a quick response to oil or gas spills. Naknek should be a regional response center, with response equipment, storage, and a quick response capability.
Oil, Gas, and Solid Mineral Development	Naknek	The region also needs trained people available for quick response. Use the local Savec Training Center to train them.
Oil, Gas, and Solid Mineral Development	Naknek	Like North Slope Borough, we would like it to be easy to tax and to permit through the Borough process. BLM must comply with Borough regulations.
Oil, Gas, and Solid Mineral Development	Naknek	In the North Slope Borough, the Fed shares royalties with the State. The royalties go directly to affected villages. See the State website. There are oil and gas grants for North Slope. The people in this community would like to see the same programs.
Scoping	Newhalen written	Newhalen community is totally different from Iliamna. We invite you and other organizations to Newhalen.
Solid Mineral Development	Newhalen written	The area is home to some of the most abundant wildlife in the world. Mining will bring an environmental mess. The loss of the (natural) environment will mean the loss of culture in Alaska, which is also one of Alaska's treasures.
Solid Mineral Development	Newhalen Written	Environmental concerns associated with mining include water quality, landscape disturbance, introduction of heavy metals that affect human and animal health, and environmental cleanup.
Solid Mineral Development	Nondalton	The Nondalton Tribal Council and the Nondalton City Council strongly oppose the development of the mining district near Lake Iliamna as it may impact the watersheds that flow into Lake Clark, Six Mile Lake, Lake Iliamna and Kaktuli River. The natural resources and renewable resources within our Bristol Bay Region is vitally important for subsistence gathering.

Resource	Source	Comment
Solid Mineral Development	Written Sitka	Retain the current protection against mineral entry. I lived and worked as a public health nutritionist in Dillingham for ca 7 years. During this time I participated in the subsistence salmon fishery and sport fished on the Nushagak near Portage Creek. Several of my friends continue to make their livings by being commercial salmon fishers. Most importantly, I observed how the Native people of this area valued this resource.
Off-highway Vehicles	Soldotna	I would like to see the Bay area remain with an open OHV designation until destruction starts; then if there is, review it.
Recreational Use	Soldotna	Commercial guiding services have a tendency to over use the resource compared to private use. When hunters are going into places, they may think they have exclusive rights. Remind them these are not private hunting grounds, but are for common use.
Access	Soldotna	Access, along with development, has to have control. There has to be EPA oversight. The Bristol Bay lake system drains into the Bay. It is an important spawning area. If development occurs, everyone must stay on top of it. If developers do so, there shouldn't be too much of a problem. If there is a spill or an accident, take care of it immediately.
Land Tenure	Soldotna	Take into consideration the value of the land that may be impacted by development. Is it possible to trade for land elsewhere of relatively same value? Did the individual get the mineral rights?
17(B) Easements	Soldotna	Access is a must for land owners and for hunting.
Subsistence	Soldotna	Infrastructure will be a plus for access. At the same time, how much public access, and how much conflict will there be? Also, we must plan for OHVs.
Oil, Gas, and Solid Mineral Development	Soldotna	Wherever there is development, for example, mining, the mining company must assume responsibility for cleanup, restoration, planting, and regrowth of natural vegetation, as they move. Groups such as students can carry out restoration projects.
Hydrology	Soldotna	Watersheds in the Bay area need protection.

Resource	Source	Comment
Cultural Resources	Soldotna	Identify areas with cultural resources. Go to the nearest village or tribe. Ask what they want to be done. Consult with them when an activity is planned. LOCAL control!
Vegetation	Soldotna	Check with the local residents.
Wildlife	Soldotna	People of the area together should make a list of important animals.
Mining	Soldotna	If there is commercial development, take before and after pictures; with mining, timber cutting, try to reasonably restore the landscape to its original condition.
Wild and Scenic Rivers	Soldotna	Until you have to do so, do not designate a river "Wild and Scenic." It has been irritating to have NPS show "ownership" of the Alagnak.
Special Management Areas	Soldotna	I can see that some areas may need restrictions.
Wilderness Designations	Soldotna	Consideration of wilderness designations should be left to the local residents to make such decisions. It should NOT be left to new arrivals or to lower 48 residents. If impacts are anticipated, have meetings to get recommendations for implementing special designations.
Renewable Resources	Soldotna	Don't allow BLM lands to be trampled down. Remember local usages of the river and lands.
Resource Management Plan	Soldotna	Make the RMP/EIS user friendly. Use plain English!
Resource Management Plan	Soldotna	Make clear that not only areas adjacent to Bristol Bay and Goodnews Bay are in the planning area, but also the upper reaches of all the drainages are included in the plan.
T&E, SSS Species	Written	One threatened species, Steller's eiders; one proposed species, Southwestern sea otters; and one candidate species, Kittlitz's murrelet occur in the area of the proposed Bay RMP/EIS. A pelagic species, endangered short-tailed albatrosses occurs offshore.
Oil, Gas, and Solid Mineral Development	Written	The Plan should evaluate the effects that gas exploration and development on BLM land would have on the immediate and surrounding habitats and the natural resources they support. Project the evaluation over at least the next 20 years.

Resource	Source	Comment
Oil, Gas, and Coal Bed Methane	Written	The potential for oil and gas exploration licensing in the Bristol Bay Basin is fair to moderate. On BLM lands east of Portage Creek coal capable of releasing methane gas has been identified.
Solid Mineral Development	Written	The block of BLM land south and West of Koliganek and west of New Stuyahok have solid mineral potential.
Solid Mineral Development	Written	Another large block of land, lying east of the Nushagak River and the villages of New Stuyahok and Ekwok, is also among state lands attracting mineral exploration.
Oil, Gas, and Solid Mineral Development	Written	Consider in detail the effects of mineral, oil and gas exploration and development on subsistence uses and resources and the habitats that support them.
Oil, Gas, and Solid Mineral Development	Written	Consider in detail the effects of mineral, oil and gas exploration and development on commercial and non-commercial recreation values of the region.
Economic Development	Written	One of our goals is economic productivity. However, economic development/productivity must be done in a way that protects the existing culture and lifestyles of the region's residents.
Oil, Gas, and Solid Mineral Development	Written (1,811 comments received)	Opening the Bristol Bay watershed to widespread mineral development would harm the extraordinary ecological resources (world's greatest commercial salmon fishery, thriving subsistence fishery, world-renowned sport fisheries, important hunting area for moose and caribou, and habitat for one of two populations of freshwater seals in the world).
Oil, Gas, and Solid Mineral Development	Written (1,811 comments received)	Protect Native villages by protecting their subsistence lands from hardrock mining and retaining all existing protections against mineral entry in the Bristol Bay area. BLM's land management actions would have an irreversible, cumulative, and adverse impact on the Bristol Bay Watershed, its salmon and the people who depend on them.

Resource	Source	Comment
Solid Mineral Development	Written	Retain existing protection against mineral entry for this important area. Mining in this area will doom future generations. Here in West Virginia, mining provides some jobs, but it has eliminated others. Those citizens who once made their living from the land have become refugees. Our culture is being destroyed. Our scenic vistas are being replaced with barren wasteland. Our streams and rivers, once pure and life-supporting, are dying. Please do not condemn the Bristol Bay region to the same fate.
Solid Mineral Development	Written	I am concerned about the big environmental threat that the proposed gold mine will bring to native Alaskans and their subsistence way of life, taking away their traditions and their culture by erasing the natural environment. Not so long ago I traveled to Alaska to discover that this is one of the most beautiful places that I have seen throughout all the Americas. I encourage you to ... realize that there is more value in conserving nature...than in constructing a mine....
Solid Mineral Development	Written	I am opposed to allowing hard-rock mining in the Bristol Bay watershed. As I understand it, the presence of mineral mining would materially degrade the land for all other users as well as the natural plant and animal species that live there. And I also understand that the other activities include fishing, fish reproduction, and human recreation. I have spent 5 weeks in Alaska enjoying the scenery, most of which was under Federal protection. BLM, as a government agency representing all Americans, has to consider these other impacts. Trading everything Bristol Bay is good for right now for mineral mining is a not a good trade or a fair trade. Please don't permit it.

Resource	Source	Comment
Solid Mineral Development	Written	As a lifelong Nevadan, I have firsthand knowledge of the damage that mining can cause when protections are either non-existent or not enforced. Decades of litigation, damage to the environment, and waste of non-renewable resources are not tolerable, especially if such problems can be avoided. Be an example to the rest of the world by protecting your beautiful state.
Solid Mineral Development	Written	Bristol Bay and the land that drains water into it is a valuable and precious place. Do not let greed lead us into mining this area thereby tampering with the fragile balance that is life there.
Solid Mineral Development	Written	I do not support extensive mining in the Bristol Bay Drainages. They are too important to the state's economy for commercial and sport purposes.
Solid Mineral Development	Written	I am an employee of the Dept. of Commerce, NOAA, NMFS. I have become an environmental steward and I hope that you will do the same as a politician and decision-maker by voting for the environment. Please keep in mind that the health of the environment should be a focal point of all political platforms.
Solid Mineral Development	Written	The disastrous proposal to open the Bristol Bay watershed up for hardrock mining would greatly damage the very unique ecology of this watershed. Native Americans who depend upon the aquatic and large game resources of this watershed have condemned this proposal.
Solid Mineral Development	Written	During my time as a ranger at Katmai National Park, I got to see first hand the amazing diversity of life and activity that centers around the Bristol Bay salmon. Please retain the existing protections against mineral entry.
Solid Mineral Development	Written	Who does the BLM work for? The American people, not the narrow-minded, selfish mining industry. Retain existing protections against mineral entry.

Resource	Source	Comment
Solid Mineral Development	Written	Any mining in this watershed will ruin future stocks of salmon as well as destroy the habitat for all other life. Mining pollution will eventually find its way into people via the ground water and sea foods.
Solid Mineral Development	Written	Mining and salmon don't mix. Don't spoil such an established fishing area. Protect the salmon. Keep out the mining business.
Solid Mineral Development	Written	Please move to prohibit development of all lands which encompass the Bristol Bay Watershed. This valuable resource must not be compromised to short term mining interests. Only through strict preservation will the value of this natural resource be truly passed down through generations of Americans. The inherent value of an ecosystem this extensive is enormous and should not be taken lightly. Please move to protect these lands for future generations of Americans.
Solid Mineral Development	Written	Before opening the public land to commercial (mining) operators, ensure that all other proposals are taken into consideration, including metals recycling and tourism.
Solid Mineral Development	Written	Retain existing protections against mineral entry. You can't fix this once you've broken it!
Solid Mineral Development	Written	I was alarmed to hear of the possibility of Bristol Bay being opened to private mining and development. Especially today, when our government increasingly puts the desires of industry above the good of local people and thriving ecosystems, it is vital that we protect our natural resources whenever we can. Please work to limit mining and ensure that protections remain in place for the salmon habitat.
Solid Mineral Development	Written	It is evil and sad that all we have grown accustomed to believing would always be there is threatened by blind greed and arrogance. We can't be blindly opposed to all progress, but we must be opposed to all blind progress.

Resource	Source	Comment
Solid Mineral Development	Written	Globally, fish stocks are being depleted. Clean, unpolluted fish from northern waters offer one of the most solid, consistent sources of food-grade seafood. Opening the Bristol Bay area to mining---an industry with a horrific record of wastewater poisoning---would not only devastate the local economy of fisherfolk and the lives of indigenous natives, it would ruin one of the few productive marine ecosystems in North America.
Solid Mineral Development	Written	The Bristol Bay area is the most spectacular place I have ever visited, and it would be a tragedy to allow mining to occur there. With today's mining technology, it is impossible to mine in a clean responsible way that will not impact this area broadly, and once the mining begins, there will be irreversible damage that will impact generations to come. There is plenty of gold in the world, and prices are relatively low, indicating there is not a strong demand for more. Given the irreversible damage that will occur if this plan (to allow wide-spread mining in Bristol Bay) moves forward, I strongly recommend against allowing it.
Solid Mineral Development	Written	At least four native villages in the area have passed strong anti-mining resolutions in defense of their land, water, fish, wildlife, communities and culture. I urge you to heed their requests and protect their subsistence lands from hardrock mining.
Solid Mineral Development	Written	Alaska holds the last great wilderness and is our greatest resource that will increase in value greater than any mineral as our population continues to boom out of control. The wilderness will draw people from all over the world providing income to Alaskans, not some outside interest. We must stop these outdated, greed motivated acts of destroying Alaska.

Resource	Source	Comment
Solid Mineral Development	Written	I am very concerned about the future of the salmon throughout North America...and especially in the Northwest States of the USA, the nursery areas for salmon have already been severely impaired, or wiped out. The remaining areas really need to be protected. Thus, protecting the Bristol Bay watershed...is extremely important.
Solid Mineral Development	Written	I am opposed to mining and I am for retaining the existing protection against mining of Bristol Bay.
Solid Mineral Development	Written	I feel that there must be protection in all areas of the environment. However, serious damage to an area with fisheries at stake is permanent.
Wild and Scenic Rivers	Written	<p>We request an evaluation of the following river-related resource values on BLM managed lands adjacent to the following river systems for protection under the National Wild and Scenic Rivers Act:</p> <ul style="list-style-type: none"> Alagnak River Kaskanak Creek Ben Courtney Creek Ole Creek Koggiling Creek Klutuk Creek Upper Talarik Creek Iliamna River South fork of Goodnews River Middle Fork of Goodnews River Barnum Creek Tivyagak Creek Puyulik Creek
Recreation	Written	Recreational objectives in the RMP should include a full spectrum of recreational opportunity including the classification of primitive.
Visual Resource Management	Written	VRM objects must be established in the Bay RMP.
Recreation	Written	The BLM should establish limits of acceptable use and allocation of the number of guide/outfitter permits in the planning area. We support a management methodology based on the Limits of Acceptable Change model.

Resource	Source	Comment
Recreation - Commercial Services	Written	BLM should anticipate increased commercial recreation services on BLM lands; BLM should proactively manage to ensure appropriate sustainable levels of use by guides, outfitters, lodges, transporters and air taxi services
Leasable and Locatable Minerals	Written	Lands recognized for containing renewable resource values should be withdrawn from coal, oil, gas, or locatable mineral entry.
(d)(1) Withdrawals	Written	Do not use the Bay RMP to revoke withdrawals on lands currently withdrawn from entry under (d)(1).
The Public Process	Written	Clarify the relationship between the Bay RMP public process and the Section 207 public process.
Development	Written	Adopt specific mitigation measures and guidelines for surface disturbing activities. Use an interagency approach.
Travel Management	Written	Plan to mitigate potential impacts from future regional access development projects.
Renewable Resources	Written	Water quality in the rivers is declining in suitability for human use due to infrastructure/development, recreation, mining, and boat activity.
Renewable Resources	Written	There's a reduced number of fish in river system for subsistence, commercial and recreational use due to increased fishing from unlimited access and from natural erosion and sediment production. The effects are overharvesting of the resource, accelerated river bank erosion affecting spawning and habitat, and loss of spawning grounds.
Renewable Resources	Written	There's a decrease in wildlife habitat for moose, caribou, bears and waterfowl for subsistence use due to unplanned and/or incompatible land management and use, and unplanned and/or incompatible human disturbance. The effects include changes in migration routes and prime habitat loss.

Resource	Source	Comment
Renewable Resources	Written	<p>The subwatersheds were prioritized by importance for planning purposes to preserve water quality and protect fish and wildlife habitat:</p> <ul style="list-style-type: none"> Lower Nushagak Middle Mulchatna Upper Nushagak Tikchik Lakes Upper Mulchatna
Solid Minerals Development	Written	<p>The only known commercial grade placer platinum deposit in the U.S. is located in the Goodnews bay area, specifically the Salmon River watershed east of Red Mountain.</p>
Solid Minerals Development	Written	<p>Platinum-bearing streams include the Salmon River, Smalls River, McCann Creek, Tundra Creek, Medicine Creek, Contact Creek, Suzie Creek, Platinum Creek, Dry Creek, Fox Creek, Clara Creek, Dowry Creek, Boulder Creek, and Squirrel Creek.</p>
Solid Minerals Development	Written	<p>Platinum is a strategic metal and any plan you devise to regulate land use in the Goodnews Bay area must take into account our future needs for this critically important metal. Goodnews Bay area is our only domestic source for it. Because the nation's energy and technology future hinges on unfettered access to platinum, we mustn't lock up those resources in the Goodnews Bay area....</p>
Solid Mineral Development	Written	<p>Certain reasonable accommodations for mining should be made now:</p> <ul style="list-style-type: none"> Do not close any areas to mineral entry Tailor plan to accommodate mining industry's needs Allow provisions for land leases Recognize need for reasonable overland access
Renewable Resource Management	Written	<p>The Nature Conservancy of Alaska (TNC) has completed an ecoregional assessment for the Alaska Peninsula and Bristol Bay Basin ecoregions, which overlap with the boundaries of the BLM's Bay planning area.</p>

Resource	Source	Comment
Renewable Resource Management	Written	The primary product of a TNC ecoregional assessment is a portfolio of areas of biological significance, a vision available to guide public land managers and others in setting priorities and developing strategies for conservation.
Renewable Resource Management	Written	Five of the portfolio areas TNC identified contain significant amounts of BLM-managed land: Goodnews Coast, Goodnews River, Kvichak, Alagnak, Lake Iliamna, and Nushagak.
Renewable Resource Management	Written	We encourage BLM to consider the ecological values of each of the TNC portfolio areas during the planning process and incorporate management actions that will protect these values in Bristol Bay.
Renewable Resource Management	Written	We recommend that BLM include the following when preparing the Bay RMP: Management goals for BLM lands within Goodnews Coast, Goodnews River, Kvichak, Alagnak, Lake Iliamna, and Nushagak areas of biological significance that conserve the plants, fish and wildlife of these areas; management goals that give priority to the protection of subsistence resources, especially salmon, in the same waterways; specific mitigation measures for potential impacts of mining and related infrastructure around Lake Iliamna; specific mitigation measures for potential impacts of oil and gas exploration and related development in the Bay area; identification of potential ACECs, RNAs, and WSRs to protect unique and highly productive habitat; and retention of ANCSA 17(d)(1) withdrawals from oil, gas, or mineral entry on all lands within the core areas listed previously (areas of biological significance).
Renewable Resource Management	Written	The Nushagak/Mulchatna-Wood/Tikchik Land Trust is concerned about the potential impact of development near areas of critical salmon habitat in the western Bristol Bay region, primarily the watersheds of the Nushagak and Togiak Rivers.

Resource	Source	Comment
Renewable Resource Management	Written	Several large sections of BLM land, drained by tributaries of the Nushagak River, are spawning habitat for the five species of Pacific salmon. The Land Trust would have grave concerns about any development, including oil and gas or mining, which would threaten salmon habitat. Salmon is a resource that has reliably provided food for the people of this region for thousands of years and a commercial economic base for more than a century. The Land Trust is working closely with the Nushagak Native corporate landowners and other private landowners to assure river health for salmon.
Renewable Resource Management	Written	The Land Trust would certainly be adverse to any development on BLM lands that could undermine the responsible land use management policies of the adjacent Native corporations.
Solid Mineral Development	Written	As a former commercial fisherman and member of a fishing community, I find it beyond comprehension that BLM would do anything that could potentially harm one of our last great salmon runs. Please consider the salmon runs and fisheries in and around Bristol Bay as paramount, beyond any benefit from potential mining. Retain the existing protection against mineral entry for this important area.
Solid Minerals Development	Written	I have visited the Bristol Bay and Lake Iliamna area---my friend's family has owned a cabin there for over 30 years. I'm shocked to hear that this pristine landscape, one of the few such existing places in our country where such a large significant watershed remains wild and unspoiled, is under threat and may be permanently decimated (by mineral entry). Please do not allow this to happen.

Resource	Source	Comment
Solid Minerals Development	Written	I object to the way this plan focuses on allowing mining uses of these public lands within the Bristol Bay region, even though it is clear that the pollution and other disturbances that result from mining will have a negative impact on the very important fisheries in the bay. I ask why the native subsistence and commercial fisheries were not provided the same advantages as the mining industry was in the determination of this land use plan. Please retain the existing protections against mineral entry. Before its final release, please modify the Bristol Bay Resource Management Plan to focus on identifying and designating important conservation and subsistence lands in effective protective status.
Renewable Resource Management	Written	A BLM plan that doesn't address the role of salmon and provide for the protection of salmon habitat would not be a plan that adheres to the mission of sustaining the health, diversity and productivity of public lands in Bristol Bay.
Renewable Resource Management	Written	We encourage BLM to approach this area mindful of experiences in other parts of the Pacific Northwest. The accommodation of multiple uses in major river systems in Oregon, Washington, and Northern California has not been good for the sustained yield of the wild salmon that returned to those rivers. In Bristol Bay we have the opportunity not to make the same mistake.
Solid Mineral Development	Written	Open pit mining in the region may bring some jobs to the local communities, but the wealth will be transported to distant corporate headquarters, bringing few true economic benefits to those who would be directly affected by this proposal. Any jobs that are produced will be offset by the effects mining will have on the natural environment that these communities are directly dependent upon.

Resource	Source	Comment
Resource Management and Planning	Written	Lake Clark National Park and Preserve, Katmai National Park and Preserve, and the Alagnak Wild River administered by the National Park Service are located within the planning area boundary and are adjacent to BLM administered lands. These conservation units have nationally significant resources and values that should be considered during alternative development and impact analysis process. We recommend that land uses on lands adjacent to the National Park System Units and the Alagnak River be compatible with the nationally significant resources and values for which these conservation units were established to preserve.
Resource Management and Planning	Written	Lake Clark National Park and Preserve (LACL) are managed to protect the watershed necessary for the perpetuation of the red salmon fishery in Bristol bay; to maintain unimpaired the scenic beauty and quality of portions of the Alaska Range and the Aleutian Range, including active volcanoes, glaciers, wild rivers, lakes, waterfalls, and alpine meadows in their natural state; and to protect habitat for and populations of fish and wildlife. Wilderness exists mostly within the park.
Resource Management and Planning	Written	BLM administered lands border LACL in two areas. BLM lands are in the northeast corner of the planning area border lands designated as park and wilderness, while BLM lands along the southcentral boundary are adjacent to lands designated as preserve. The impact analysis for each alternative should evaluate the potential effects on the park's air quality, water quality, fish, wildlife, sport fishing, access, wilderness values and subsistence activities.
Resource Management and Planning	Written	Katmai National Park and Preserve (KATM) are managed to protect habitats for, and populations of, fish and wildlife including...high concentrations of brown/grizzly bears and their denning habitat; to maintain unimpaired the water habitat for significant salmon populations; and to protect scenic, geological, cultural, and recreational features.

Resource	Source	Comment
Resource Management and Planning	Written	BLM administered lands border KATM along the unit's northwest border. KATM lands in this area are designated as preserve. The impact analysis for each alternative should evaluate the potential effects on the park's air quality, water quality, fish, wildlife, sport fishing, access, wilderness values, and subsistence activities.
Resource Management and Planning	Written	The Alagnak Wild River is managed free of impoundments and diversion, is inaccessible by road, has primitive shorelines and unpolluted waters. The Alagnak is one of the most popular fly-in fisheries in southwest Alaska, and has experienced a significant increase in use over the last several years. The Alagnak Wild River protects populations of all five species of Pacific salmon, as well as significant populations of rainbow trout, arctic char, arctic grayling, and northern pike. The increasing sport fishery on the river is a topic of concern to many subsistence users and other local residents.
Resource Management Planning	Written	BLM administered lands occur on the northern and southern boundaries of the Alagnak Wild river corridor. The impact analysis for each alternative should evaluate the effects on the river corridor's air quality, water quality, fish, wildlife, sport fishing, access, and subsistence activities.
Resource Management	Written	Evaluation of the planning area for wildlands qualities and special area protection status should be prioritized in the Bay RMP, and ultimately, as part of the management structure of the BLM in Alaska.
Planning	Written	BLM is obligated to manage the public lands in accordance with the multiple use mandate. BLM must look at the entire landscape and develop a management plan which accommodates the diverse needs of all public land users and balances the needs for economic development with sustainable resource conservation.

Resource	Source	Comment
Planning	Written	The recommendations submitted by ACFE, Alaska Coalition, NRDC, Sierra Club, and the Wilderness Society for protection of certain Federal lands are not intended to counter the subsistence needs of residents and local subsistence users. A conservation emphasis on the resources in the bay planning area would greatly enhance and demonstrate a commitment to the preservation of the natural resources that subsistence users heavily depend upon for their livelihood.
Planning	Written	Inventory and identify potential lands for the National Wild and Scenic Rivers System, ACECs, RNAs, and other special designations as warranted. We anticipate opportunities to review these inventories and analyses as they are completed throughout the planning process.
Fisheries	Written	The fisheries resources in the Bay planning area, specifically the waters and tributary streams of the Kvichak, Nushagak and Goodnews Rivers and Lake Iliamna are among the richest in the world. All contribute to the overall vitality, proper ecological function and successful economic growth of the fishing industry and subsistence harvest of this region. Surface disturbing activities must be required to uphold the absolute highest standards of environmentally sound operation to prevent permanently impairing fisheries resources. The RMP should specifically address fisheries management, especially critical salmon spawning rivers and adjoining uplands.

Resource	Source	Comment
River-related Resources	Written	<p>We request an evaluation of the identified river-related resource values on BLM lands adjacent to the following river systems for protection under NWSRA or for special area management designation:</p> <p>Alagnak River, Kvichak River Tributaries (Kvichak Bay Area, Kaskanak Creek, Ben Courtney Creek, Ole Creek), Nushagak River Tributaries (Koggiling creek, Klutuk River, Upper Talarik Creek, Iliamna River), Goodnews River and tributaries (South and Middle Forks Goodnews River, Barnum Creek, Tivyagak Creek, Puyulik Creek), Bering Sea Coastal Streams (Jacksmith Creek, Cripple Creek, Indian River), Arolik River and Tributaries (South Fork Arolik River, Faro Creek).</p>
Migratory Birds	Written	<p>In the spring and fall, the Carter Spit area serves as an important site for migrating waterfowl. Commercial and non-commercial recreation opportunities to this location can be expected to grow over the next 20 years and beyond. BLM must establish proactive management directives to regulate any development activities. We recommend evaluation of Carter spit for special area management designations (ONA, RNA, or SRMA as appropriate). We recognize that a significant threat in the possibility of future mineral development activities, which may adversely affect Carter Spit. We also recommend the Carter Spit for protective ACEC designation.</p>
Consultation	Written	<p>BLM should follow the consultation and coordination put forth in EO 13186.</p>

Resource	Source	Comment
Off-highway Vehicles	Written	We support protective management OHV management tools that enable proactive BLM management. We encourage BLM to work closely with the residents of the 23 villages within the planning area to identify the trail system connecting the villages with the public lands. Create maps of current and reasonably foreseeable areas of future OHV use. We recommend a “limited” designation, and setting weight limits. Incorporate recommendations of the BLM RAC (2004).
Access	Written	BLM should address any public easements that were not completed in its 2001 review, including RS2477 and ANCSA 17(b) easements.
Oil, Gas, and Solid Mineral Development	Written	Lands recognized for significant resource values should be withdrawn from coal, oil and gas or locatable mineral entry, including: All portions of designated/eligible WSR corridors All lands within proposed RNAs, ACECs and SRMAs. Lands within 400 feet of anadromous rivers and streams. VRM Classes I and II. Primary fish spawning habitat. Critical moose and caribou winter range and calving areas. Split estate lands should not be available for leasing.
Coal	Written	Should coal bed methane deposits exist in the planning area, BLM should seek extensive public input and develop stringent mitigation guidelines before allowing development of the resource.
Oil, Gas, and Solid Mineral Development	Written	Revisions to the 1872 Mining Law are necessary before the BLM proceeds with opening up public lands to mineral entry. In the interim BLM should define and establish area wide terms, conditions, or special considerations necessary to protect resource values. Mineral withdrawal should remain on the specific rivers and lands listed above.

Resource	Source	Comment
Oil, Gas, and Solid Mineral Development	Written	We request that the management alternatives in the draft RMP/EIS include maps of all BLM administered lands to be opened or remain closed to locatable mineral entry. We request that BLM does not use the Bay RMP to revoke ANCSA 17(d)(1) withdrawals until the public has had a chance to review which lands are currently closed. We further request clarification on the relationship between the Bay RMP public process and the Section 207 public process, particularly concerning opportunity for public comments on the withdrawals within the Bay planning area.
Mitigation Guidelines	Written	Adoption of specific mitigation measures and guidelines for surface disturbing activities is an invaluable tool necessary to help minimize impacts related to oil, gas, mining exploration and development operations in the Bay planning area. Cumulative impacts of surface disturbing activities must be identified and mitigation guidelines established in an interagency setting. Permitted activities must be required to adhere to stringent mitigation guidelines.
Wildlife	Written	A cooperative interagency approach to ecosystem based management is critical for the survival of the caribou herds and villages' subsistence needs. We recommend BLM work with Togiak NWR to adopt consistent conservation objectives to protect the Nushagak and Mulchatna herds.
Recreation	Written	Develop benefits-based recreation management objectives, considering supply, demand, and preferences, with adjoining land managers. Implement specific monitoring indicators and standards for recreation management. Establish and correlate VRM classes. Established limits of acceptable use (LAC) and allocation of the number of guide/outfitter permits in the planning area.

Resource	Source	Comment
Access	Written	BLM should anticipate an increase in commercial recreation services on BLM lands. BLM should proactively manage to ensure appropriate, sustainable levels of use by guides, outfitters, lodges, transporters and air taxi services.
Vegetation	Written	Implement a strategy to prevent the spread of noxious and invasive plant species, esp. with mineral entry/development.
Subsistence	Written	Prioritize the protection of subsistence resources. Achieve a balance between mineral development proposals/operations and protection of subsistence resources. Address conflicts between subsistence resource users, sport hunters, and fishermen. Four native villages in the planning area have passed strong resolutions in opposition to widespread mining in the Bristol Bay area.
Access	Written	Plan to mitigate potential impacts from future regional access development projects.
Planning	Written	Consider releasing for public review a summary of preliminary alternatives prior to the release of the draft Bay RMP.
Cultural Resources	Written	Define a cultural resource management strategy in the alternatives for the Bay RMP. Protective measures for cultural resources are necessary with proposed development. We strongly support the government-to-government scoping meetings that have occurred between Bristol Bay villages and the AFO during the scoping comment period as an important and essential part of the public process.

Resource	Source	Comment
Wilderness Values	Written	<p>The Wilderness Values inventory process for the Bay planning area has not occurred. This inventory should be completed and should include a thorough Wilderness review and inventory of the Bristol Bay and Goodnews Bay planning area and forwarded to Congress. We strongly urge BLM to recognize Wilderness as a resource category. Adherence to Secretary Norton's memo will cause BLM to prepare plans in violation of law. The American public deserves the opportunity to understand the resources values at stake and the opportunity to influence the future of their public land.</p>

VIII. Acronyms Used in This Report

ACEC	Area of Critical Environmental Concern
ADF&G	Alaska Department of Fish and Game
AMS	Analysis of the Management Situation
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act
ATV	All-terrain Vehicle
BLM	Bureau of Land Management
DNR	Alaska Department of Natural Resources
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act of 1976
FWS	U.S. Fish and Wildlife Service
GIS	Geographic Information System
GMU	Game Management Unit
IRA	Indian Reorganization Act
LAC	Limits of Acceptable Change
MFP	Management Framework Plan
NPS	National Park Service
OHV	Off-highway Vehicle
PLO	Public Land Order
ROS	Recreation Opportunity Spectrum
RMP	Resource Management Plan
RNA	Research Natural Area
VRM	Visual Resource Management
WSR	Wild and Scenic River